
PROPOSED EXPANSION OF GERMAN AIR FORCE OPERATIONS AT HOLLOMAN AFB, NEW MEXICO

FINAL ENVIRONMENTAL IMPACT STATEMENT

VOLUME III: COMMENT LETTERS AND RESPONSES TO COMMENTS

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UNITED STATES AIR FORCE

APRIL 1998

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13. ABSTRACT (Maximum 200 words) The Final Environmental Impact Statement analyzed the potential environmental consequences from the proposal to beddown 30 additional German Air Force Tornado aircraft and 640 personnel at Holloman Air Force Base (AFB) New Mexico. The proposal would include construction affecting 96 acres at Holloman AFB. In order to meet the training needs of the Tornado aircrews, three training options were considered. These training options included the same basic elements, and differed only with respect to use of airspace and ranges. The options were (1) Construct a new target complex (NTC) on western Otero mesa on McGregor Range; (2) construct a NTC in the Tularosa Basin portion of McGregor Range; and (3) using existing target areas for air-to-ground training. The analysis presented impacts to airspace, noise, land use, air quality, biological resources, archaeological, cultural, and historical resources, water resources, hazardous material and waste management, socioeconomics, transportation, utilities, soils, and safety. The findings indicate that potential environmental impacts from the proposed action and all training options would include increased aircraft related noise in some portions of the affected airspace, slight to moderate impacts to biological resources, overflight disturbance to land use, and positive economic growth.				
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**PROPOSED EXPANSION OF
GERMAN AIR FORCE OPERATIONS
AT HOLLOMAN AFB, NEW MEXICO**

**PRELIMINARY FINAL
ENVIRONMENTAL IMPACT STATEMENT**

**VOLUME III: COMMENT LETTERS
AND RESPONSES TO COMMENTS**

**Prepared for
Headquarters, Air Combat Command
Langley Air Force Base, Virginia**

**Prepared by
U.S. Army Corps of Engineers
Fort Worth District
Fort Worth, Texas**

**Reproduced From
Best Available Copy**

APRIL 1998

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PREFACE

The U.S. Air Force is proposing to locate an additional 30 German aircraft at Holloman Air Force Base (AFB). In addition to the beddown of the 30 aircraft, the proposed action would include the location of 640 additional personnel and construction of associated support facilities. In order to meet the air-to-ground training needs of the German aircrews, three training options are being considered, as well as a No-Action alternative:

- Constructing a new target complex (NTC) in the west portion of Otero Mesa on McGregor Range.
- Constructing an NTC in the Tularosa Basin portion of McGregor Range.
- Using the existing ranges and target complexes on White Sands Missile Range and Melrose Range.

The Draft Environmental Impact Statement (DEIS), *Proposed Expansion of German Air Force Operations, Holloman AFB, New Mexico*, was published and distributed for review on June 13, 1997. The public comment period for the DEIS extended from June 20, 1997 through August 4, 1997. Public hearings on the DEIS were held between July 7, 1997 and July 12, 1997. Six locations were selected for the public hearings on the basis of their proximity to the areas potentially affected by the proposed action and because they are regional centers of interested organizations and individuals:

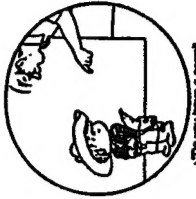
- Alpine, Texas (July 7, 1997)
- Dell City, Texas (July 8, 1997)
- Truth or Consequences, New Mexico (July 9, 1997)
- Fort Sumner, New Mexico (July 10, 1997)
- Carrizozo, New Mexico (July 11, 1997)
- Alamogordo, New Mexico (July 12, 1997)

The purpose of these hearings was to provide a forum in which the public could seek clarification of the analyses presented in the DEIS and to receive questions and comments. Transcripts of the public hearings, copies of presentation materials, and submissions provided for the record by state and federal agencies, as well as private citizens, are presented in Volume II of the Final EIS (FEIS). The transcripts and submissions have been reviewed to identify individual comments concerning the DEIS. Discrete comments are identified with a two-letter code for the hearing location, and sequential number indicating the order in which the comments were made (e.g., Ap-97 is the 97th discrete comment identified in the Alpine public hearing.) Comments were used to identify areas where additional analysis might be desirable. Responses to these comments are provided at the end of the transcripts.

In addition to the comments received at the public hearings, comment letters were accepted throughout the public comment period (June 20, 1997 through August 4, 1997). Copies of the comment letters are provided in Volume III of the FEIS. As with the public hearing transcripts, each letter was reviewed to identify discrete comments, and each discrete comment was assigned a sequential number. As with the public hearing comments, the letter comments were used to identify areas requiring further analysis. Responses to individual comments are provided at the end of the comment letters.

SECTION 1.0

COMMENT LETTERS



JUNE 11, '97

RE:

EXPANSION OF GERMAN AIR FORCE OPERATIONS
AT HOLLOMAN AFB.

PLEASE CONSIDER THE ENCLOSED INFORMATION
WHEN MAKING A FINAL DECISION.

BASED ON AN AIR SPEED OF 500-600
MPH, THE PLANE CRASHED BETWEEN 2
+ 3 MINUTES FROM OUR POPULATED CITY.

Sincerely,

Ken Roberts

Ken Roberts
3439 Sequoia Loop
Alamogordo, NM 88310
(505) 434-0940

German fighter plane crashes at White Sands

By Jim Conley
El Paso Times

A German Air Force Tornado jet fighter crashed Tuesday at White Sands Missile Range. The two crew members ejected from the cockpit and parachuted safely to the ground.

Pilot Maj. Eike Tenme was taken to William Beaumont Army Medical Center in El Paso. The jet was in stable condition. Frank E. Goetz was examined and released. Air Force Capt. Larry Cox said.

The plane was on a routine training mission with another jet when it crashed around 11:25 a.m. on the Army's test range about 25 miles west of Tularosa. The other jet was not affected.

Officials are investigating the incident. It was the first crash of a

Holloman-based Tornado. The \$23.5 million aircraft was destroyed.

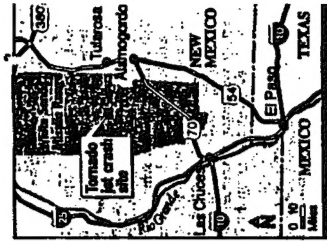
Twelve of the European-made jets are at Holloman, and another 30 may be added in fiscal year 1989.

The plane was assigned to the German Air Force Tactical Training Center, which was dedicated at Holloman in May 1986.

The German Tornados came to Holloman with great fanfare last spring.

The aircraft, used by several European nations including Great Britain, served extensively in the 1981 Gulf war. The Tornado is in the heavy class of fighters, able to carry more armament than many smaller, more maneuverable aircraft.

Environmental hearings in the region last summer revealed some organized opposi-



tion to a proposal — still under consideration — to construct a new practice bombing range on Otero Mesa, south of Alamogordo, to accommodate the needs of the Germans.

Sierra Club members, ranchers and others said they would not like to see any of the popular public hiking, hunting and ranching area near Timbiron used for such a range.

NOTE: 2 OTHER TORNADES CRASHED WHILE "TRAINING OVER NEW MEXICO" LESS THAN 1 YR. AGO.



DEPT. OF THE AIR FORCE
HQ ACC/CEVA
129 ANDREWS ST. SUITE 102
LANGLEY AFB, VA. 23665-2769

ATTN: PLEKSE
THOMAS K. PARKER

23665/2769 23

6/23/97

TO WHOM MAY BE CONCERNED:
(IF ANYONE)

IN REFERENCE TO HEARINGS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED EXPANSION OF GERMAN AIR FORCE OPERATIONS AT HOLLAMAN AFB NEWMEX.

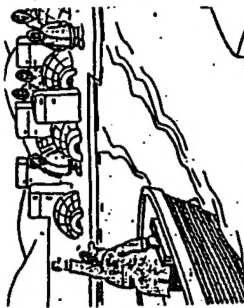
WE KICKED THEIR ASS WORLD WAR I WE AGAIN KICKED THEIR ASS WW.II. PROBABLY HAVE TO KICK IT AGAIN BY WW.III. PROBABLY RIGHT HERE

WILL WOULD SOMEONE PLEASE EXPLAIN TO US WHY THE HELL ARE THEY HERE, LET ALONE EXPANDING THEIR OPERATIONS,

IT'S BAD ENOUGH SEEING, HEARING, FEELING OUR OWN AIRCRAFT 24 HOURS PER DAY, 7 DAYS A WEEK, WITHOUT PUTTING UP WITH FOREIGNERS, ESPECIALLY GERMANS.

ALSO CURTAIL SOME OF YOUR OPERATIONS, TALK TO THE FUNKS THAT LOVE TO BUZZ FOLKS HOMES, ESPECIALLY NITE TIME.

M/M DAVE REID
402 MALLETTE DR
BELEN, N.M. 87002



Ken Roberts, King of salespersons.

JUNE 25 '1997

PLEASE CONSIDER THE ENCLOSED STATEMENTS FROM OUR LOCAL CHAMBER OF COMMERCE WHEN CONSIDERING 30 MORE WARRENES AND MANY MORE FOREIGN SOLDIERS AND THEIR FAMILIES.

SHERYL, NEXT YOUNG AMERICAN ARMEN AND THEIR FAMILIES HAVE HAD TO GIVE UP THEIR HOMES HERE WHEN THE LEASES WERE UP AS THEY COULD NOT AFFORD DOUBLE THEIR RENT. THE FOREIGNERS COULD BECAUSE THEIR GOVERNMENT PAYS HALF OF THEIR RENT. MY PROPERTY TAXES HAVE GONE UP OVER 70% AS A RESULT. ECONOMIC IMPACT?? HELP!!

Ken Roberts
3439 Sequoia Loop
Alamogordo, NM 88310
(505) 434-0940



ITEM	Oct. '95	Oct. '96	% Change
Electric meters (July '96)	15,229	13,291	-15.0
Gas meters	12,670	13,169	+3.9
Water meters	10,263	10,349	+0.8
Building permits	94	73	-22.3
Bldg. permit value	\$1,652,334	\$1,227,254	-25.7
Total employment (Sept. '96)	18,717	19,072	+1.9
Unemployment rate (Sept. '96)	6.5%	6.5%	+27.2
Population estimate (Sept. '96)	34,121	33,129	-2.9
WSNM visitors	42,969	46,981	+9.3
ISHF visitors	6,549	6,372	-2.6
Planetarium visitors	4,377	5,013	+14.5
Oliver Lee State Park	5,270	3,284	+37.7

*figures from local sources

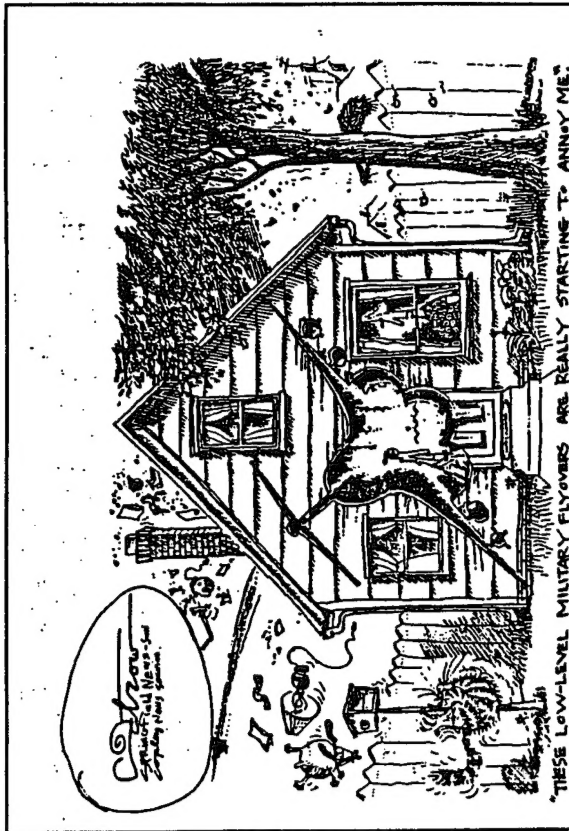


THESE BUSINESS FACTS WERE PUBLISHED EACH MONTH IN A SUPPLEMENT TO OUR LOCAL NEWSPAPER AS "CHANGING CHARTS". I'M CERTAIN THAT MY USING THESE FIGURES TO ILLUSTRATE OUR NEW FOUND PROSPERITY HAD NOTHING TO DO WITH THE SUPPLEMENT BEING DISCONTINUED!

DEPT. OF THE AIR FORCE
Hq ACC/CEVA
129 ANDREWS ST. SUITE 102
LANGLY AFB, VA. 23665-2769

ATTN:
SHERYL K. PARKER
PROJECT MORE

Opinion



THIS IS OBVIOUSLY IN REFERENCE TO THE PEOPLE IN ALAMOGORDO COMPLAINING. BUT --- YES, IT WINS IN OUR PAPER, WHICH IS PART OF A VERY LARGE CHAIN OF SMALL TOWN U.S.A. PAPERS.

NOTE THE AUTHOR OF THIS CARTOON, SPRINGFIELD NEWS-SUN CARMICHAEL NOT MINE JUST FOR ALAMOGORDO! COULD THIS BE A WIDE SPREAD PROBLEM?

ALAMOGORDO BUSINESS FACTS*

ITEM	Sept. '95	Sept. '96	% Change
Electric meters (July '96)	15,183	15,403	+1.4
Gas meters	12,388	12,606	+1.8
Water meters	10,193	10,194	+0.01
Building permits	90	69	-23.3
Bldg. permit value	\$1,358,307	\$782,945	-42.4
Postal receipts	\$199,909	\$107,082	-46.4
Total employment (Aug. '96)	18,867	19,297	+2.3
Unemployment (Aug. '96)	1,224	1,720	+40.5
Unemployment rate (Aug. '96)	6.5%	8.9%	+36.1
Population estimate (Aug. '96)	33,885	34,496	+1.8
WSNM visitors	47,248	61,085	+29.3
ISHF visitors	6,149	6,024	-2.0
Planetarium visitors	3,993	4,748	+18.9
Oliver Lee State Park	1,960	7,355	+275.3

*figures from local sources

10/2/96

ALAMOGORDO BUSINESS FACTS*

ITEM	Aug. '95	Aug. '96	% Change
Electric meters (July '96)	15,155	15,472	+2.1
Gas meters	12,467	12,626	+1.3
Water meters	9,510	10,194	+7.2
Building permits	79	69	-12.7
Bldg. permit value	\$1,702,996	\$782,945	-54.0
Postal receipts	\$199,909	\$107,082	-46.4
Total employment (July '96)	18,852	19,297	+2.4
Unemployment (July '96)	1,314	1,720	+30.9
Unemployment rate (July '96)	6.9%	8.9%	+28.1
Population estimate (July '96)	33,419	34,498	+3.2
WSNM visitors	60,874	62,503	+2.7
ISHF visitors	10,359	13,433	+29.7
Planetarium visitors	8,281	11,462	+38.4
Oliver Lee State Park	2,050	1,175	-42.7

*figures from local sources

NOTE: THE MILES IN FLEX
F THE GUYAN LETTERS
DECEMBER IN ALAMOGORDO
SEPT. '95.

June 25, 1997

ATTN: Sheryl K. Parker

USAF HDQR, ACC

129 Andrews Street, #102

Langley Air Force Base, VA

The "environmental" hearings held in connection with the original German Air Force Tornado training flights and the expansion are a useless expenditure of time and money.

No one is concerned about rabbits, gophers, coyotes, rattlesnakes, mesquite, cacti, etc.

The main complaint at the meetings I have attended in Dell City, TX, is that these are GERMAN airplanes. Why don't

they train in Russia, where there is a lot more room than the 300 NM used in NM and TX? Is it that the DoD needs

the money the German Air Force is paying? Are they really paying or using a loan or grant from the United States?

Who benefits besides the United Nations and the citizens in Alamogordo? Was this deal authorized by the Congress?

If so, under what provision of the Constitution?

These are my concerns, too.

Lois H. Ziler

Lois H. Ziler

P.O. Box 67

Dell City, Tx 79837

cc: Congressmen



01 July 1997

HQ ACC/CEVA
Langley AFB, VA 23665-2769

Attention: Ms. Sheryl Parker

Subject: Expansion of German Air Force Operations at Holloman AFB

Dear Ms. Parker:

For the past six years Westar, a New Mexico Corporation, has been supporting the 49 FW at Holloman AFB by operating and maintaining the air-to-surface ranges utilized by myriad operational and training units, both domestic and foreign. New Mexico provides an ideal climate for hosting this type of activity: there is an abundance of airspace, the weather is relatively dependable, the Holloman air-to-surface ranges are excellent and safe, and the population is sparse.

Our experience has shown that the German Air Force has a benign influence on the environment; they are no different than any U.S. operational unit. They comply with the same, and in some cases greater, restrictions governing the operations of domestic units. Since our company has been involved in the operations and maintenance of the Holloman ranges, we have seen many positive environmental initiatives implemented and successfully managed. Given these initiatives and the excellent range and airspace management contingent at the 49 FW, the expansion of the German Air Force Operations can be viewed in a positive light, especially when one considers the increase in jobs, economic activity, and cultural enrichment that will result.

On behalf of our company and especially our employees living and working in Southern New Mexico, please consider this a positive vote for welcoming the expansion of German Air Force Operations at Holloman AFB.

Sincerely,

WESTAR CORPORATION

By: *[Signature]*
Joe I. Durant
President

cc: Senator Pete Domenici
Congressman Steve Schiff

Westar Corporation
6808 Academy Pkwy East NE Building C, Suite 3 Albuquerque, NM 87109
505 / 345-6291 505 / 345-6380 (FAX)

WILLIAM F. BRINEY, M.D., F.A.C.S.

1400 Highland Road • Roswell, New Mexico 88201

(203-244-680-1066)

July 1, 1997

Sheryl Parker
Air Combat Command Environmental
Analysis Branch
HQ ACC/CEVA
Langley AFB, VA 23665-2769

Dear MS Parker:

As far as I know, there is NO information available
[w-4 in Roswell, NM re the Draft Environmental Impact
Statement.]

With and the Draft EIS I am unable to make
an elegant statement re the increased action for
which will be required for 30 German AF Jornado
p/s.

Please send me all available information -
I will be out of State during Public Hearings -
Sincerely,

Wm F. Briney - Col - Ret. USA. M.C.

Requested copy be
forwarded to Dr Briney
(Fed ex) on 7/18/97

7/10/97

7 Memo:

To: HQ ACC/CEVA, 109 Anderson St. Suite 102

Langley Air Force Base, VA 23665-2767

Attn: Mr. Sheryl Parker

From: Quitta S. Parker, P.O. Box 115, T.O.C. Wm 87911

Subj: Proposed Expansion of German Air Force
Operations at Holloman Air Force Base, NM

I strongly oppose to your directive that
the German Air Force Operations at Holloman
be extended (your notice did not give any
date of extension).

Since they have been at the base, the planes
and helicopters are in the air from early
in the morning until all hours in the evening.
They fly so low it is hard to sleep
or concentrate. We live close to Elephant
Butte Lake.

Why don't they practice in their own
country? Since they would be practicing
these countries that is where they should
be practicing, or vice they photographing
our state?

over

WRITTEN COMMENT SHEET

EXTENSION OF GERMAN AIR FORCE AIRCRAFT OPERATIONS AT
HOLLOMAN AIR FORCE BASE, NEW MEXICO

Thank you for your input.

DATE: 1/8/97

PLEASE PRINT

(WE ARE ON VACATION SINCE JAN 23, 1997)
I AM NOT FULLY EDUCATED RE ENVIRONMENTAL DAMAGE
OR EFFECT OF THE HOLLAMAN AIR FORCE ACTIVITIES
HOWEVER - JUST PRIOR TO OUR DEPARTURE FROM
TIMBERON (OUR HOME OF 12 YRS IS LOCATED THERE) WE HAD
OCCASION TO EXPERIENCE SEVERAL SINIC BOOMS. I
WANT TO GO ON RECORD THAT (REGARDLESS WHAT
WORDS WERE ENCOUNTERED) MY HOUSE ACTUALLY SHOOK.
A TYPE OF BLAST HIT THE WALL SO HARD I SUSPECTED
THE WINDOWS FOR DAMAGE (NOW) IT SCARED ME SO MUCH
I WAS SHAKING AS I TRIED TO CALM OUR DOG. WE
WERE INSIDE, SO I CAN ONLY IMAGINE WHAT PHYSICAL
DAMAGES COULD BE SUCH AS FRIGHTENING A HORSE
TO BOLT & OR I KNOW STUDIES ARE CONDUCTED
ABOUT SPEEDS EXPECTED, BUT YET I DO KNOW
"RULES" ARE BROKEN. THESE EXPLOSIVE BASES
ENCOUNTERED BY US WERE NOT SHORT THE
HORSE RANGLER VIBRATES REVERBERATING THROUGH
THE CANYONS WITHIN THE SOUND & EXPLOSIVE NOISE
BEING DISAPPEARED IN THE DISTANCE. PLEASE
CONSIDER OUR PHYSICAL IMPACT EVEN IF ENVIRONMENTAL
ISN'T CONSIDERED. THESE EXPERIENCES ARE DIFFICULT
FOR OLDER (E IN MANY CASES - IN) CITIZENS OR
EXPERIENCED (THIS CASE) WITH THE BLASTS QUANTIFIED IN AN
EXPERIENCE (.... CONTINUE ON BACK FOR MORE SPACE)

NAME: Mary Jane v Dave Davis

ADDRESS: Box 31

CITY: TIMBERON

STATE/ZIP CODE: NM 88350

Please check if you would like to receive a copy of the Draft Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:

AIR COMMAND ENVIRONMENTAL ANALYSIS BRANCH

100 AVICTVA

ATTN: SGT. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23065-2769

Since (and) the U.S. is not at war, why
are you doing so many maneuvers
in this part of the U.S.?
We would appreciate having a
quite living condition in our old
age.
Thank you for your consideration

MINDS WHETHER OUR HOME CAN WITHSTAND
 AERIAL EXPOSURE FROM A RELOCATION OR
 EXPANSION SO CLOSE TO TIMBERLIN.
 THESE WOODS COME CALMLY - FROM MY
 HEART ALTHOUGH WE LOVE OUR COUNTRY & WANT
 TO CONTINUE PROTECTING IT.

ALSO, PLEASE EXCUSE MY HANDWRITING, SINCE
 I AM AWAY FROM A TYPEWRITER/COMPUTER AS IS
 USUALLY USED.

RESPECTFULLY,

P.S. I WOULD HOPE YOU COULD FIND ANOTHER
 LOCATION FOR THIS TRAINING (NOT EFFECTING
 TIMBERLIN RESIDENTS)

From
 Laurie Gartner
 77. Davis TX

Dear Mr. Parker

Thank you, and the Air Force, for
 notifying me of the town meetings being
 held concerning the proposed fly over.

I'm writing because I won't be able to
 make the one in my area.

Of course, nobody wants aircraft flying
 over their homes, and everybody knows
 it has to be done somewhere.

Of the reasons I might name for ob-
 jecting to the fly over in The Big Bend
 area of W-Texas, I will, of course, state
 the one most dear to me.

This is about the only area in America
 where people can still seek refuge from
 noise. It's very remote, beautiful, and
 quiet here.

I feel that it might be more
 reasonable to fly over an area where
 people haven't worked so hard to get out
 of the traffic.

For consideration
 Thank you, Laurie



Mr. Heard you - how
transfer
\$100 will
stand - a done deal!

CIRCLE RANCH
SUE & TOPPER FRANK
P.O. Box 218
VAN HORN, TEXAS 79655
(915) 986-2445

The Honorable Strom Thurmond,
United States Senate
Washington, D.C. 20510

Dear Senator Thurmond,

I am writing to you to express my opposition to any flights of the German Air Force pilots in the Trans-Pecos region of Texas. I am opposed to these flights for two reasons, and I will offer you an alternative.

First, our Trans-Pecos area of Texas is a sparsely populated but uniquely beautiful country containing two national parks, which interestingly are exempt from these flights by German pilots! The Trans-Pecos is world renowned for the vastness and tranquility of our mountains, and there is a value to that tranquility and quietness that I believe would be destroyed by the low-level (100' to 500') high-speed flights of the German planes. I believe this will be seen in a drop in property values.

My second and major objection to these low-level flights is because it is the German Air Force. All of the property in the Trans-Pecos (with the exception of the afore-mentioned parks) is privately owned. These property owners are taxpayers, but we do not pay taxes to Germany! I understand that the U.S. Air Force has made this agreement to train German pilots, but since the U.S. Air Force --and NOT U.S. taxpayers--made the agreement, then let them train German pilots over Federal land, NOT OVER PRIVATE PROPERTY IN WEST TEXAS! The U.S. Government owns one-third of the land mass in the United States. The U.S. Air Force should use this Federal land to meet their obligations to the German Air Force---but do not force U.S. taxpayers and property owners to participate in something they do not support monetarily or in principle. The U.S. Government and the U.S. Air Force should not force private property owners to be subjected to something that they themselves are not willing to absorb first over Federal land and national parks!

My solution specifically is to base the entire German Air Force training operation at Nellis AFB in Nevada. This base is already used for part of the German pilot training, and it would be in the heart of the largest block of Federal land.

In summary, I oppose any flights by the German Air Force over West Texas and I request that all German pilot training be moved to Nellis AFB in Nevada. I also request that you respond to this letter.

Yours truly,

Sue Frank
Sue Frank

Carbon Copies to:

All members of the U.S. House Committee on National Security
All members of the U.S. Senate Committee on Armed Services
Senator Phil Gramm, Senator Kay Bailey Hutchison,
Holloman AFB



CIRCLE RANCH
SUE & TOPPER FRANK
P.O. Box 218
VAN HORN, TEXAS 79655
(915) 986-2445

The Honorable Floyd Spence
United States House of Representatives
Washington, D.C. 20515

Dear Representative Spence,

I am writing to you to express my opposition to any flights of the German Air Force pilots in the Trans-Pecos region of Texas. I am opposed to these flights for two reasons, and I will offer you an alternative.

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My solution specifically is to base the entire German Air Force training operation at Nellis AFB in Nevada. This base is already used for part of the German pilot training, and it would be in the heart of the largest block of Federal land. The U.S. Government and the Air Force should not force private property owners and taxpayers to be subjected to something that they themselves are not willing to absorb first over Federal land and over national parks!

In summary, I oppose any flights by the German Air Force over West Texas and I request that all German pilot training be moved to Nellis AFB in Nevada. I also request that you respond to this letter.

Yours truly,

Sue Frank
Sue Frank

Carbon copies to:

All members of the U.S. House Committee on National Security
All members of the U.S. Senate Committee on Armed Services
Senator Phil Gramm, Senator Kay Bailey Hutchison, Holloman AFB

10

Iola Sue Hill
PO Box 665
Terlingua, Texas 79852
USA
Home Phone 915-371-2711

July 11, 1997

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street
Suite 102
Langley Air Force Base, VA
23665-2769

FLY OVERS

Dear Ms. Parker,

I wanted to add my voice to those who are opposed to the Fly Overs of the Big Bend area. I don't believe that you really care but I want you to know how my husband and I feel about this. We bought our ranch April of 1990. We have lived in the Dallas/ Ft. Worth Metroplex for our whole lives. It is projected to be five million by 2000. With our whole heart, we desired a better way to live. We bought here at Terlingua with the hope of getting away from everything that we hated. My husband retired in January from police work after 25 years of service. We truly want a quiet and peaceful life now. We deserve it!!! But unfortunately, the world continues to unravel. Since we bought our ranch, the Carbon plants in Mexico have made it almost impossible to see the Chisos mountains out our front door. The Rio Grande has been declared one of the most endangered rivers in the USA. And now, we understand that the Air Force wants to do LOW flight training in our air space!!! Can you possibly think we don't care!!! Well, let me tell you, we do care!!! Please do not do this!!! We are already raped and pillaged, please do not add this insult to us!

Sincerely,
Richard and Sue Hill

July 14, 1997

Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA
Attention: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Let me say up front, I'm mad as hell and I'm not going to sit still for any more lies from the United States Air Force. A copy of this letter is being sent to President Bill Clinton, Vice-President Al Gore, Secretary of Defense William S. Cohen, the Joint Chiefs of Staff, the Cable News Network, PBS News Hour, NBC Nightly News, CBS News & 60 Minutes and ABC News.

You send your mouthpieces into our community to lie and deceive us. You bring in people from outside our area to steal the limited time you have supposedly allotted for us to voice our opposition (or support - none of which exists here) to your outrageous proposals. You intentionally fill our time with meaningless doublepeak from an outsider. Your mouthpiece wastes an hour talking about how you are going to protect the bats of New Mexico, avoiding the hazards you hope to expose us to in West Texas.

You invade our wide open spaces with noise and the ever present possibility of plane crashes. You promise us what you won't do, then do the opposite. In the public meetings with us your mouthpieces told us, "Indicate where you are if you don't want us flying over your homes and ranches and we will make them 'no-fly zones.'" But there is no regard shown for any of these fictitious "no-fly zones" and the dangerous overflights continue. Case in point - We are told that the red circles on your pretty little maps indicate the "no-fly zones" where no training aircraft will be flown at 500 feet above the ground such as the ten mile radius circle surrounding Alpine, Texas. I have repeatedly seen your aircraft flying at very low altitudes within 5 miles of Alpine, Texas directly over our homes through a populated subdivision. These aircraft are passing within mere yards of thousand foot cliff walls while they fly overhead at about 500 feet above the ground. We call the "horrid" at our expense to report the situation, but the "illegal" flights continue to occur in the supposed "no-fly zones."

Last year when your spokes people were asked point blank if the number of flights would be increased above the number that was being proposed at that time we go a flat, "No!" Now you are trying to increase the flights by 30 more planes. Are we surprised? Absolutely not.

The primary sources of income in our community are tourism and ranching. Do you think city folks spend 7 hours or more in there cars to get here - in the middle of nowhere - to see military aircraft having dog fights over their heads in remote Big Bend National Park or Big Bend State Park? What about the impact on our community? Is it of no value? Our impression of the Air Forces' concern, "Nah! We don't need to do an Environmental Assessment! There are only 10,000 people living there. What do we care about 10,000 Americans in the middle of nowhere?"

Our here in the Big Bend Country of Far West Texas we see through the Air Forces' lies and deceptions. We don't have the distractions of the big city. We sit on our porches in the evening and watch the sun set. We know and talk to our neighbors. We share the vegetables out of our gardens. We still have a spirit of community, something most of this country has lost. The United States Air Force doesn't give a damn about how we feel about them destroying our peace and quiet or the tranquility of one of the "Last Frontiers" in the United States of America, and we know it! But, unlike those city folk you have so thoroughly fooled, we aren't going to sit quietly while you steamroll over us. We know you have no regard for the environment of West Texas or concern about the impact of the United States Air Forces' outrageously low military training flights just above our heads. Can you say, "Class Action Lawsuit?"

Appallingly yours,

Bernie Zelazny
PO Box 523
Alpine, Texas 79831-0523

[X] Please check if you would like to receive a copy of the Final Environmental Impact Statement.

cc: Pres. Bill Clinton; VP Al Gore; Secretary of Defense William S. Cohen; Chairman of the Joint Chiefs of Staff; Cable News Network; All Politics; PBS News Hour; NBC Nightly News; CBS News and 60 Minutes; ABC News.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

As President of the Otero County Economic Development Council, I highly recommend the approval of this project. This project is of vital economic importance to this area. The payroll generated from the additional 600 German AF personnel will add approx. \$25,000,000 annually into the economy and create approx. 250 additional jobs to the community. Obviously, that will also generate additional funds to both city and county government in the form of gross receipts taxes.

In a community that historically has a higher unemployment rate than other cities (both in N.M. and nationally), a project such as this is very desirable.

The effect of these additional people in the community will not have an appreciable impact on our infrastructure. More importantly, they would help the economy.

The German AF personnel are an asset to our community.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Larry Shulse

ADDRESS: 7151 Tenth

CITY: Alamogordo

STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

Thank you for your input.

PLEASE PRINT

I, and the American people in general, do not have much faith in public meetings and draft Environmental Statements because we get the impression that the Federal Government considers what it desires as the "done deal" despite any adverse comment from the people.

But since I have two homes that are within the German Air Force Operations umbrella, I will comment.

One of my homes is at 7200 feet in Weed, Otero County. My husband and I have had this home for about 25 years. It has always been peaceful and quiet in our home in the forest until recently when planes started flying at treetop level over our property.

We are a military family. My father was with the 7th Cavalry and retired after service in both World War I and II. My husband and his four brothers all saw service in World War II. My son has recently retired from the Air Force.

My husband is an Air Force veteran who was shot down over Germany during World War II. He, with the help of the underground folks, was able to get back to England and complete his 57 missions. 50 in B24s and seven reconnaissance missions in B25s. My son can fly anything the Air Force has. Neither my husband nor my son feel that you have to fly at treetop level over people's homes as a training mission.

My second home is on Caballo Lake in Sierra County, also in the area where these planes are flying too low. This lake is the second largest lake in New Mexico. Elephant Butte Lake which adjoins Caballo

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Annie C. McManus

ADDRESS: P. O. Box 62

CITY: Caballo,

STATE/ZIP CODE: New Mexico 87931

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

over

WRITTEN COMMENT SHEET

DATE: July 14, 1997

Lake is the largest. Sierra County has less than 10,000 residents, but on holidays we have from 80,000 to 100,000 people come into our county for recreational activities on the two lakes and in the five mountain ranges. This past 4th of July 122,000+ people were in the county for the three day holiday. Low level planes are not welcome in an area of fishermen, family campers, etc.

I do not think that it is necessary for German Air Force planes to use this nation's air space for its training.

I am 76 years old and was an adult during World War II.

While I am commenting - I wrote to the Commanding General at Fort Bliss and asked him why our U.S. Army vehicles and our service men have no U.S. ID either on vehicles or uniforms? I have lived in the army town of El Paso for the past 30 years, moving to New Mexico about five years ago, and it was a shock to me to see this ID removed. I suppose you know the answer to this question. The Commanding General was kind and considerate in his explanation, but I feel that it is just one more step closer to a One-World government.

THE ENCLOSED INFORMATION IS FOR YOUR PERSONAL INFORMATION ONLY. I am a retired school teacher and feel that I should share information with my fellow Americans when their lives and welfare are in the balance.

Signed: Annie C. M. = Mamma

TO:

Bill Wilks

423-481-8594

Assume you have this.

Confirmed: German Troop Movements

by Carolyn Bart, Houston Chronicle - March 21, 1997

BEAUMONT — Trainloads of German military equipment will soon be rolling through Texas on its way to training exercises at the White Sands Missile Base in New Mexico.

[Editors Notes are in brackets. It is bad enough that they have dismantled and disbursed our militia around the globe leaving us with little to defend ourselves. Now they bring foreign troops and equipment to our soil. Could it be for the smacking/occupying armies to use against us?]

The German troops began unloading 91 shipping containers and 159 trucks and trailers full of equipment at the Port of Beaumont Friday. The Territer is scheduled to begin unloading 692 trucks and trailers today.

[Keep in mind a container is about the size of a semi truck! What do you suppose is in these containers? Trucks, and trailers — food for the homeless? Perhaps long-term food supplies in case we have a drought? Do you suppose they could be loaded with weapons and supplies meant to be used against you?]

The equipment, mainly ground-to-air missile systems, will be joined by 2,300 German Air Force. And new troops in New Mexico for a training exercise called "Operation Rolling Sands." Brig. Gen. Wilfried Scheffer, commander of German troops in the United States, said Friday that the exercise gives German troops an opportunity to train with their American counterparts. He said the desert country of New Mexico provides plenty of ground and air space for training exercises.

German Troops in U. S. Outnumber Other Allies

Their command center in Reston controls a network of troops.

By Ronan Scarborough The Washington Times - May 19, 1996

Germany, a mortal enemy a half-century ago, today has more troops stationed in the United States than any other ally and recently opened its own fighter training center inside an Air Force base in New Mexico.

The German network of troops undergoing training and schooling is commanded from a sprawling office complex tucked among Reston's manicured lawns, golf courses, and industrial parks.

The German presence here has grown since the Cold War's end, when the United States cut its troop deployment in Germany from 300,000 to 100,000. With fewer Americans in Central Europe, the Germans must come here in larger numbers to brush up on joint operations, said Gen. Gerd R. Meyer, a native of Bavaria who heads the German Armed Forces Command for the United States and Canada.

[The foreign troops are here to takeover our country! Oh, the advantage a prophecy student has to know the plans of the devil in advance.]

"By training together, we keep up our mutual understanding of the military requirements of the prospective partner," said Gen. Meyer, who earned his U.S. Army paratrooper wings at age 54 in 1991 at Fort Benning, Ga. "This is important if you are going to go into peace missions and humanitarian missions together."

War Games

USA Today - April 8, 1997

More than 30,000 soldiers, sailors, airmen and Marines from four countries will conduct one of the world's largest high-tech joint military exercises near Ft. Bliss, Fort Bliss officials announced. German.

Border Area 21 - Calls For The Elimination of Border Between

Mike Allen
The Independent

SHOW LOW - The utopian city of the future will be devoid of nationalism, racial strife and individual sovereignty, according to the latest information out of the White House.

Tucked beneath the coattails of the 1993 North American Free Trade Agreement (NAFTA) was an additional agreement implementing what has come to be called the La Paz Agreement that calls for the elimination of the United States/Mexico international border at Arizona, New Mexico, California and Texas. The La Paz Agreement was implemented in January 1997 and calls for a 60 mile strip north and south of the border to be an open zone and will be called "Border Region 21."

The agreement is a new environmental program that eliminates sovereignty as well as the borders of the two countries with funding provided through the creation of the "Border Environment Cooperation Project" (BECO) and the North American Development Bank (NADBank).

According to California Investigative Reporter Karen Bixman, the new region has literally created an area that combines both Mexico and the United States into one and will affect 10 million people.

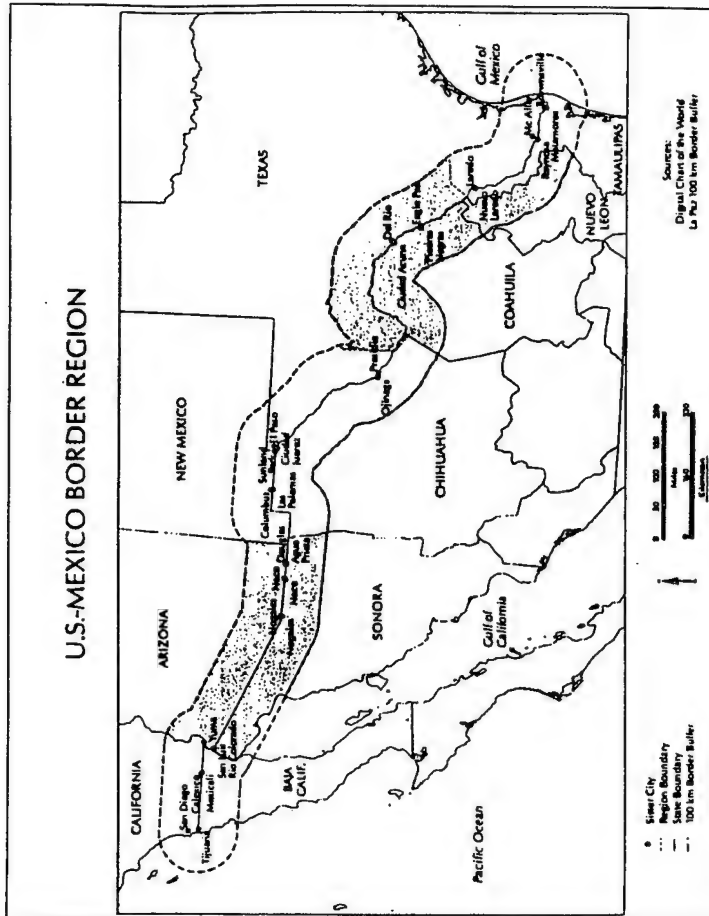
The major purpose of Border 21 is to provide Sustainable Development to the newly created border region. According to treaty documents, Sustainable Development seeks to restructure education by "providing lifelong learning opportunities (OBE) and creates visioning councils which will limit urban sprawl, refurbishes land area to be designed for pedestrian and bicycle traffic and makes use of rail corridors for intercommunity visions."

To manage the newly created region, US federal agencies and Mexican agencies have been combined. For environmental protection: The US Environmental Protection Agency, Natural Resources and Fish- eries and Mexico's Secretariat for Inter- ment and Secretariat for Social Develop- ment.

For Natural Resources: The US Depart- ment of the Interior, the US Department of Agriculture and Natural Resources and Fish- eries.

For Border Water Resources: US-Mexi- can sections of the International Boundary and Water Commissions.

For Environmental Health: US Depart- ment of Health and Human Services and Mexico's Secretariat of Foreign Relations and International Institutions such as BECO and NADBank.



Mexico and US

Some of the key objectives of the agree- ment will be within the biodiversity and pro- tected areas:

- 1) Improving and expanding protection of species and habitats,
- 2) Promoting sustainable management of natural resources in the entire border zone through productive projects to improve the quality of life for local communities,
- 3) Managing natural protected areas to guar- antee the conservation of ecosystems and biodiversity. To manage this area properly, the US Geological Survey has acquired in- frared aerial photography. The cameras will do mapping of the area as well as the moni- toring of proper land usage, forest manage- ment, water resources and the protection of natural resources.
- 4) Promoting sustainable aqua culture devel- opment while preventing habitat degrada- tion and declines in resident species. END

This information came from The Free American U.S. Highway 380 Box 2943, Bingham, New Mexico, 87832 (505) 423-3250 Fax (505) 423-3258

federal government by entering into inter- national treaties, is exceeding its authority under the Constitution.

One reason for the bill's introduction is because President Bill Clinton has ex- pressed his intention to make the ratifica- tion of four international treaties a top pri- ority, in spite of a ruling by the Supreme Court that said a treaty preempts both the constitution and federal laws.

The memorial states "these treaties in- clude those proposed by the Convention on Biological Diversity and the Human Con- vention on the Rights of the Child. The rat- ification of these onerous proposals would strip states and individuals of their consti- tutionally granted authority and would re- sult in the United Nations wielding more authority over citizens of the United States than does the federal government. It. The cre- ation of the World Trade Organization (WTO) has already given the United Na- tions the authority to impose sanctions not only on any nation but on individual indus- tries within a sovereign nation and the trea- ties adversely affect the rights of states and the people as delegated by the federal con- stitution."

While a memorial has no teeth like a bill or law, if approved, it is the first step in notifying the federal government that the state intends to regain state control of those matters affecting the State of Arizona and its people.

END

State Comes Out Against Treaties

PHOENIX - The 43rd session of the Ari- zona State Legislature is considering a me- morial that will urge the Congress of the United States to refuse to ratify any more global treaties until a determination of their impact on states has been made.

The memorial, HCR 2007, was intro- duced by a slew of legislators, including Rep- ublican Jake Flake of Snowflake, and reminds Con- gress that the Tenth Amendment of the Con- stitution of the United States provides that "the powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people" and that the

PUBLICATIONS

The following President's Council on Sustainable Development reports are available free of charge by calling

800-363-3732:

1. Sustainable America: A New Consensus for Prosperity, Opportunity, and a Healthy Environment for the Future, February 1996, (186 pp.)
2. Building on Consensus: A Progress Report on Sustainable America, January 1997 (57 pp)

3. Task Force Reports from first phase of PCSD:

Eco-Efficiency, 1996
Energy and Transportation, 1996
Natural Resources June 1997
Population and Consumption 1996
Public Linkage, Dialogue, and Education, February 1997
Sustainable Agriculture 1996
Sustainable Communities June 1997

4. Eco-Industrial Park Workshop Proceedings - held October 1996 available February 1997

5. Proceedings of the Workshop on Extended Product Responsibility held October 1996. Available February 1997.

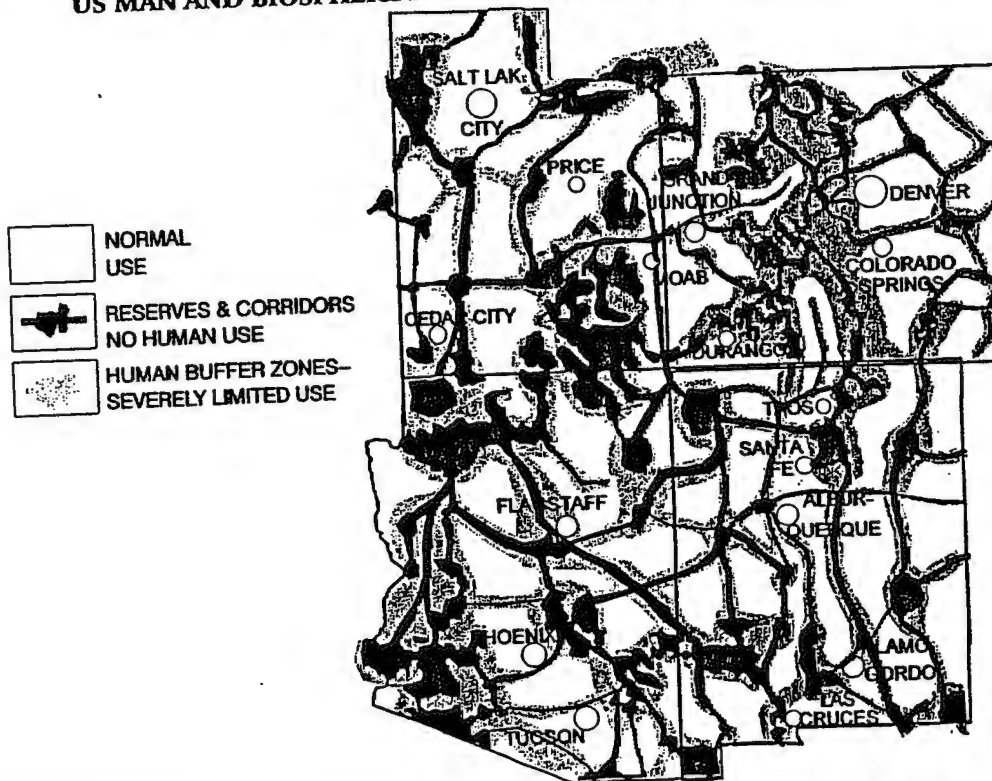
***These come from the Department of Energy and Efficiency Clearing House.

The Wildlands Project - Tel 520-884-0875
You will receive this information within a few days.

Information on the Border 21 Program
Call (800) 334-0741 and ask for the complete program.
The Executive Summary- October 1996
1996 Implementation Plans - October 1996
The Framework Document - October 1996

There are all sorts of work groups but it is very difficult to get information from the EPA (Environmental Protection Agency.) The Grant County PW President asked for 100 of the above books. He was told that after an investigation by the FBI and if he would let a speaker address his group, he would be given some books. He was investigated by the FBI. The speaker came July 8, but still no books.

THE PLAN TO PROTECT BIODIVERSITY IN THE SOUTHWEST THE BIODIVERSITY TREATY, PRESIDENTS COUNCIL FOR SUSTAINABLE DEVELOPMENT, US MAN AND BIOSPHERE PROGRAM AND THE WILDLANDS PROJECT





DR. LELAND L. FELLOWS
CHAIRMAN OF THE BOARD

FIRST NATIONAL BANK of Raleigh
451 Suddeth • Raleigh, New Mexico 88345 • (800) 287-4033

MS. SHERYL K. PARKER
HQ ACC/CEVA
129 ANDREWS STREET, STE 102
LANGLEY AIR FORCE BASE, VA 23665-2769

DEAR MS. PARKER,

I HAVE REVIEWED THE ENVIRONMENTAL IMPACT STATEMENT RE: GERMAN AIR FORCE AT HOLLOMAN AIR FORCE BASE. THE STUDY IS REALLY WELL DONE.

I THINK THAT THE IMPACT ON THE COMMUNITY OF ALAMOGORDO WILL BE QUITE POSITIVE. I AM IN ROTARY WITH THE GERMAN COMMANDER AND HAVE DISCUSSED THEIR MISSION. ALAMOGORDO NEEDS THE BOOST IN ECONOMY AND THE GERMANS NEED THE CLEAR SKY TO TRAIN.

BY BACKGROUND, I AM A RETIRED GYNECOLOGIST WHO PRACTICED IN ALAMOGORDO FOR 35 YEARS. I NOW LIVE IN RUIDOSO AND HAVE HEARD NO NEGATIVE COMMENTS ABOUT MORE GERMAN PLANES.

I ALSO OWN A RANCH IN THE VAUGHN ARE AND DO HOPE THE GERMAN PILOTS WILL BE CAUTIONED ABOUT FLYING TOO LOW OVER OUR SHEEP.

YOURS TRULY,

Leland L. Fellows

LELAND L. FELLOWS, M.D.

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: _____

Name: *Order Lewis*

This letter is in response to the meeting I attended at Alamogordo, NM on July 19th. I do not have a copy of the D.E.S. for the proposed expansion of the Holloman Air Force Base. I have requested one. For this reason, I am opposed to this expansion. Not only people I know have a copy of the D.E.S. I request that the stoping period be extended. I get a copy before August 4/1997. I will write a more indept response.

Thank you

Order Lewis

CONTINUE ON BACK FOR MORE SPACE

NAME: *Order Lewis*

ADDRESS: *Box 144*

CITY: *Paria*

STATE/ZIP CODE: *N.M. 88344*

Please check if you would like to receive a copy of the Final Environmental Impact Statement. |

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769



State of New Mexico
ENVIRONMENT DEPARTMENT
 Harold Runnels Building
 1190 St. Francis Drive, P.O. Drawer 26110
 Santa Fe, New Mexico 87502-0110
 (505) 827-2865
 Fax: (505) 827-2836



MARK E. WEIDLER
 SECRETARY

GARY E. JOHNSON
 GOVERNOR

Louis and Molly Weber
 2556 Cherry Hills Drive
 Alamogordo, NM 88310
 (505) 443-1356
 July 15, 1997

HQ ACC/CEVA
 129 Andrews St., Suite 102
 Langley Air Force Base, VA 23665-2769
 Attn: Ms. Sheryl Parker

Dear Ms. Parker:

This letter is in regard of the Final Environmental and Impact Statement for the expansion of the German Air Force operations at Holloman Air Force Base, New Mexico.

Currently there are severe problems with US West phone service in our area where many Air Force personnel live. Additional personnel may chose to live here also. Numbers are jumbled and phone service was out more than it was in last month for many of us in the golf course region. It took a phone call to the headquarters in Albuquerque to an official before the problem was remedied. If, indeed, it is.

Let's get real. Alamogordo does NOT have the infrastructure to accommodate more citizens. Forget the fly-over problems, forget the spooking cattle issue and you still have an infrastructure designed for the current size of the community. It matters not whether the group is of German origin or not. That is not the crux of the matter. Depletion of services which aren't the best anyway is the concern.

Of course the Chamber of Commerce wants more. We might even say realtors want more - wrong! I am a licensed broker - have been since 1977. I am also a retired high school teacher. Please do not ignore the concerns of this community. Listen to those who want the best for all.

We have been ignored when it comes to nuclear waste and storage disposal. Let this community work through its current problems without additional concerns to be addressed.

Sincerely,

Louis and Molly Weber
 Louis and Molly Weber

July 15, 1997

Sheryl Parker
 Headquarters Air Combat Command/CEVA
 129 Andrews Street
 Langley AFB, VA 23665-2769

Dear Ms. Parker:

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED EXPANSION OF
 GERMAN AIR FORCE OPERATIONS AT HOLLOMAN AFB, NEW MEXICO; UNITED
 STATES AIR FORCE; JUNE 1997

The following transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Draft Environmental Impact Statement (DEIS).

WATER QUALITY

All construction, operational activities and testing of equipment by the United States Air Force or the German Air Force must comply with the 1) "State of New Mexico Standards for Interstate and Intrastate Streams," and 2) "New Mexico Water Quality Control Commission Regulations." Particularly applicable sections of the Standards to be noted are Sections 1102, 2801, and 3101. Exceedance of surface water standards would be in violation of the New Mexico Water Quality Act (NMSA 1978, Sections 74-6-1 et seq).

Owners/operators of construction projects of five acres or more are required to apply for, at a minimum, permit coverage under the National Pollutant Discharge Elimination System (NPDES) baseline general storm water permit for construction activities. This permit coverage may be obtained by filing a Notice of Intent (NOI) no later than forty-eight hours prior to commencing construction activities. Among other things, this permit requires that a site-specific, Storm Water Pollution Prevention Plan (SWPPP) be prepared before submission of the NOI and that appropriate pollution prevention measures be installed at the site, in a timely manner. Best Management Practices (BMPs) are measures or practices used to reduce the amount of pollution entering surface or ground waters, which must be developed and implemented for each five acres or larger construction site. Information on the development of BMPs may be acquired from the New Mexico State University/Cooperative Extension Service, the U.S. Department of Agriculture/Soil Conservation Service and the U.S. Environmental Protection Agency's (USEPA) document entitled

Sheryl Parker
July 15, 1997
Page 2

"Storm Water Management For Construction Activities". Information regarding this document and copies of the baseline general permit (which includes the NOI form) may be obtained by calling USEPA at (202) 260-7786.

The following discusses specific activities listed in the DEIS which could cause potential impairment to surface water quality during ephemeral flows:

1. Page 4-93 of the DEIS states that approximately 36 acres would be disturbed at Holloman Air Force Base (HAFB) during the period of construction. Excavation activities could create large areas of unconsolidated soils and could be the source of accelerated rates of fine sediment transport during summer rain storms. The increased volumes of fine sediment would collect in the stormwater drainage system and be carried down stream to Lake Holloman. Best management practices (BMPs) should be implemented at all construction sites to minimize erosion and impairments to surface waters. If properly written, implemented and monitored, the SWPPP mentioned above should address this issue.

2. Page 4-93 also mentions that the proposed actions would increase the volume of hazardous material stored and used at HAFB. These activities could increase the potential contamination of the local surface waters. Guidance and standard operating procedures established to prevent hazardous materials from entering surface waters must be strictly followed. Any spills that may occur must follow the response and reporting procedure required in the New Mexico Water Quality Control Commission Regulations.

3. Page 4-94 states that the proposed actions at Red Rio Live Drop Target (LDT) would increase the delivery of live munitions from the current level of 500 units to 2,000 units in FY00. This activity would lead to increased soil disruptions and subsequently increase the potential for soil erosion during summer rain storms. BMPs should be implemented at this test site to minimize the potential of erosion and sediment transport into surface waters.

4. Page 4-95 mentions that the increased usage at Red Rio LDT would result in an accumulation of uncombusted explosive materials that could potentially be transported off site. Precipitation in this area is low, and the only potential period for transport would be during summer rain storms. Proper BMPs must be implemented to stop residual levels of TNT from entering surface waters. The introduction of TNT or other explosive materials could result in an exceedance of the Toxic Substances Water Quality Standards (Section 1102.F).

5. Page 4-96 states that construction at the McGregor Range will disturb 5,120 acres for the New Target Complex (NTC) and an additional 80 acres for access roads. All of these construction activities must follow the NPDES baseline general storm water permit for construction operations.

In summary, the actions described in the DEIS are not expected to be associated with significant impacts to surface waters in New Mexico if all necessary BMPs are identified, implemented and monitored.

With respect to potential ground water impacts, we should note that the current discharge plan for the wastewater treatment plant at the Base is permitted for 1.5 million gallons per day, which can accommodate the additional discharge anticipated with this project without requiring modification of the permit.

Sheryl Parker
July 15, 1997
Page 3

AIR QUALITY

HAFB submitted an air quality permit application to the Department's Air Quality Bureau, in accordance with the Clean Air Act and New Mexico Administrative Code, on December 18, 1995. The permit application was ruled complete on March 11, 1997 and is currently under review by the Air Quality Bureau. The permit application self-designates HAFB as a major source for criteria and hazardous air pollutants.

The project location is in an area classified as attainment-- wherein air quality meets or exceeds the National Ambient Air Quality Standards (NAAQS). The Multiple Aircraft Instantaneous Line Source dispersion model was used to estimate air pollutant concentrations from sorties by Tomado and other aircraft in the areas of greatest potential activities that would be conducted under the proposed action. Portions of adjacent Dona Ana county are classified as marginal nonattainment for ozone and moderate nonattainment for PM₁₀. The nonattainment areas are restricted to the southern border region of the county (i.e., south of the airspace potentially affected by the proposed action). Therefore, the proposed action would not encompass the nonattainment segment of the county.

There will be a temporary increase in air emissions due to ground disturbing activities, combustion products from the tree-clearing and grading equipment, and vehicle emissions from worker travel to and from the site. Implementation of control measures in accordance with standard construction practices will minimize these effects on air quality.

If the facility decides that there is a need to add other stationary sources, new source review permits may be required and the impacts on Title V compliance would be evaluated.

As long as the contractors supplying the aggregate and asphalt for any projects on base have current air quality permits, we find no deficiencies or inaccuracies in the information provided which would prevent an adequate environmental assessment of this project.

HAZARDOUS WASTE

We should note that section 4.8 Hazardous Materials and Waste Management of the DEIS is not sufficiently specific when addressing the amount of hazardous waste and type of waste streams expected to be increased by the project; in particular:

- If there is a new "waste stream" added then a permit modification and a revision of Part A may be required under 20 NMAC 4.1 Subpart IX at § 270.42.B.
- If the expansion causes an increase in waste storage greater than 25% a permit modification will be required under 20 NMAC 4.1 Subpart IX § 270.42.F.

The first year that HAFB exceeds the estimated annual quantity of any waste stream caused by the expansion, a letter may be filed to address the overage. If HAFB expects to exceed the annual quantity again in subsequent years then a revised Part A Application must be prepared and filed with NMED. If Part A is incorporated into the Resource Conservation and Recovery Act (RCRA) Permit for HAFB, a Permit Modification will be required under 20 NMAC 4.1 Subpart IX § 270.42.

Sheryl Parker
July 15, 1997
Page 4

During the active life of a training range it is exempt from RCRA until such time "waste" is managed. For example if the Unexploded Ordnance (UXO) is left in place or "treated in place", also called "blown in place", RCRA would not take effect. If the waste or UXO is collected and moved to another location it would be considered management and the area of collection then would fall under RCRA jurisdiction.

We appreciate the opportunity to comment on the DEIS; please let us know if you have any questions on the above.

Sincerely,


Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1104ER

Tom Curry
901 West Sul Ross
Alpine, Texas 79830
(915)837-2311

Ms. Sheryl Parker
Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA
Langley Air Force Base, VA 23665-2769

July 16, 1997

Dear Ms. Parker:

I would like to express my outrage over the jet fighter tests you are planning to conduct over the beautiful Big Bend area of Texas. Folks that live here, do so for the tranquility, the uncontaminated wilderness of one of the few remote regions left. Many retired people used their life savings to move here to escape the noise and congestion of cities.

Since moving here from Austin in 1992, my wife and I thought we had finally found a place where we could escape the constant urbanization and exploitation of the land. During this time, however, we have seen the air become polluted by coal burning plants in Mexico, tons of waste from New York City being dumped here, a planned nuclear waste dump, and now our government wants to turn the area into another White Sands.

Citizens here have already expressed overwhelming opposition to these test flights. The reasons are many: Noise, the danger of accidents both on the ground and in the air with private air craft flying around the Big Bend, a decrease in property values, disruption of wild life habitats, a loss of the Western film industry that has been thriving here (it's hard to film a movie set in the 1800's if jets are flying over in the background) and a loss of tourism in which many people depend on for their living. There is a quality of life here that's much like it was 100 years ago. Outside forces who don't understand this would like to change all that. But there are people here who will fight for that lifestyle. I'm not talking about just a few ranchers. I'm talking about a number of very well-known people who have invested a great deal of money in their properties. Properties that are directly along the IR 102/144 flight path. If they are unaware of your proposed actions they *will* be notified.

One last comment I would like to make is that it seems to me that the military's purpose is to defend the American way of life. What you are proposing to do, using private land for dangerous, noisy flight testing is not defending our way of life but deteriorating it.

Alpine Avalanche

Serving the Big Bend and Davis Mountains Country since 1891

Hometown Newspaper of Edwin McCallum - Read by David Burton of Dallas, Texas

Home of...



Vol. 106 No. 28

Thursday, June 10, 1997

18 PAGES 2 SECTIONS PLUS INSERTS

AVALANCHE angles

Air Force encounters heavy flak

WATER OFF TODAY

Alpine residents in certain areas will have to prepare for water being cut off Thursday (today).

The cutoff area will be from Cherry to 13th along Sul Ross. This will include most of the Shipman Addition.

Time will be from 8 a.m. until 5 p.m.

Citizens should save water in case of extremely hot weather.

HOME OF THE MONTH

Homes of the Month awards were presented Tuesday night by the Alpine City Council.

They went to: Ward 1—Don and Donna Philbrick; Ward 2—Cino Pasqua; Ward 3—Mr. and Mrs. Chet Wilson; Ward 4—Mr. and Mrs. Earl Lively; and Ward 5—Lanette Turner.

In Ward 4—Alpine Interiors, owned by Ennar and Kimberlee Eisner, was named Business of the Month.

The Air Force Monday night brought its proposed plan to train German pilots in low flying missions over this area and encountered a heavy barrage of flak from area residents.

Approximately 60 persons attended the meeting at the Alpine Civic Center and one after another told Holloman Air Force Base representatives they were adamantly opposed to the plan.

Not a single person spoke out in favor of the proposal to expand the German Air Force mis-

sion by 30 additional Tornado aircraft.

This number would add to the 12 Tornados presently stationed at Holloman. These aircraft are not at this time flying low level routes over the Big Bend—Davis Mountain region. They are scheduled to begin this previously authorized flights within six months.

Low level missions with the 30 additional Tornados are not scheduled to begin until October 4, 1999.

But no matter when they are scheduled, now or

later, the people at the meeting said "no way."

Purpose of the Monday night meeting was to explain the reason for the Environmental Impact Statement, the area it will cover, the reason it is needed, how it will be accomplished and what is hoped will be the final outcome.

Col. James Hengel served as moderator for the meeting and representing the Air Force were Sheryl Parker, Langley AFB, Va.; Bob Johnson, Holloman AFB; and Lt. Col. Don Hargarten, Holloman.

"This not a done deal," Johnson said "in fact, it may never be a done deal. The only action so far has been to do this EIS draft and now obtain the public's response to it."

Suspicion, hanging like a heavy cloud of Carbon 1 and II emissions over the audience, greeted Johnson's "not a done deal" statement.

That strong suspicion of governmental actions

SEE AIR FORCE PAGE A2

Candidates total 25 for City Manager

The Alpine City Council has its job cut out when it begins screening the 15 applicants for the City Manager position.

Deadline for application ended June 30 and applications received reached 25.

Applicants come from all parts of the country, east, west, south and

Vista, Arizona; Bonnie H. Lenoir Jr., San Angelo; Rex W. Shaddox, Alpine; William R. Brown, El Paso; Curtis A. Schrader, Cloudcroft, New Mexico; Also, J. Doug Avery, Midland; John E. Miller, Midland; David L. Knapp, Midland; James R. Keene, Las Vegas, Nevada; James Davis Minor, Mineral Wells; Kevin Carmack, Phoenixville, T

BRILLANT DISPLAY



I also have three questions that I would like answers to:

1). How far (approximate miles) would Tornado jet noise carry to each side of a flight path (barring any kind of high wind conditions)? For example, if a sortie flies over Shafter, Texas or Cibolo Creek Ranch what would the sound level be in Marfa?

2). Will any of the proposed sorties deviate from the IR 102/144 flight path and if so, what recourse do we as citizens have in making sure they stay on the flight path?

3). Will you acknowledge my comments and furnish answers to my questions in a reasonable amount of time?

Sincerely,

Tom Curry

Tom Curry
Vietnam era veteran

cc: Langley AFB
President Clinton
Al Gore
Sec Defense
JCS
CNN
ABC
CBS
NBC
PBS
US Representative Henry Bonilla

AIR FORCE

from page 1A

was placed on the open floor when Mac White spoke. "Why is it when we call the base with a complaint it is not important enough the next morning for them to call back? I have called and have yet to receive a call back from anyone. The Air Force wants more and more all the time. When is it going to end?"

White graphically described a B-1 crash in the Chisum Mountains where he helped fight the resulting fire. "You call the base with a complaint and the day after tomorrow the damage and the devastation. Mountains are being leveled."

Susan Curry echoed White's expression. "The biggest problem is the cumulative impact. You have 12 aircraft now, and you say you are going to add 30 more. How many more will there be in the future?"

The question of "why don't you do this flying over New Mexico where the government owns all the land?" brought an answer from Bob Jones of Dall City.

"The government does not own all of New Mexico," he said. "We own ranches in both New Mexico and Texas."

After asking Col. Hargarten several questions, as he did Sheryl Parker, he stated: "If this goes any further with out relief, we have no alternative but to file an intent to sue on violations of property rights."

Another not so veiled threat was issued by Harold Pettibone, chairman of the Jeff Davis County Republican Party.

"The people of West Texas own their property and make a living from it. I can see only damage to people and animals. We can impact your program. By constant letter writing to the Defense Department and other higher officials we could possibly get your base closed."

Ray Hendricks didn't have representatives "in there anyway [can get a notice when planes are going to fly over here?]. Remember, I asked the same question last year and was told it could be worked out, but I have never heard back."

The answer: "We are not flying those missions from Holloman right

now and will not be for another six months."

Kathleen White asked: "How long with these air routes be used?"

Hargarten answered: "Indefinitely."

"How many flights will there be?"

"How do we know you will fly what you say?"

"We could fly fewer sorties, but should not go over the number we have scheduled."

Kathleen White brought up two good subjects, air space rights and socio-economics.

"Isn't it right that property owners have rights to the airspace above their property? Has this been addressed in the EIS?"

"The Air Force attorney present said: 'You are right about airspace rights. But they do not extend into infinity. This has not been addressed in the draft.'"

White: "Have socio-economic damages been considered? For instance, if I had a prize \$10,000 bull and because of a low overflight he ran into a barbed wire fence and cut himself, but enough he died. Wouldn't the Air Force responsible for that animal?"

Parker answered: "That is not addressed in this EIS, but there is a study going on in the Air Force right now about damages. It is not in draft form but is being discussed."

Dallman said: "Both noise and the turbulence affect us, and could cause someone serious damage. Would you study this effect and send something to the newspapers so they can pass it on to the public?"

She received no promises to do so.

Kathleen White also told the group: "If you could show one solid proof that this training is absolutely essential to our national security, then you would be facing a different attitude here."

Air Force residents have until August 4, 1997 to submit written comments. They should be mailed to the address below:

Ms. Sheryl Parker, HQ ACC/CEVA, 129 Andrews Street, Suite 102, Langley Air Force Base, VA 23665-2769.

FT. WORTH, TEXAS
18, July 1997

MS SHERYL PARKER, HQ ACC/CEVA
129 ANDREWS STREET - SUITE 102
LANGLEY AIR FORCE BASE, VA. 23665-2769
DEAR SIR:

THIS IS THE SECOND LETTER TO THE AIR FORCE I HAVE WRITTEN IN PROTESTING THE LOW ALTITUDE, REFUELING, MISSELCARING, NIGHT-TIME, GAME-SCARING, FLIGHT IN '68 ABOUT OR OVER MY PROPERTY.

I HAD HUNT LEASE OF OVER 200 ACREAGE OF TURNER & DEER, FIRST YEAR, BUT SECOND YEAR A LOW FLYING AIRBORNE FLEW OVER, LOW, CAUSING OVER 12 DEER TO RUN HAND OVER 600 YDS. - A CROSS COUNTRY ROAD INTO ANOTHER'S PROPERTY OVER 1000 YDS. OFF MY LEASE.


IT SHOULDN'T TAKE A 2"x4", TURNED EDGEWISE UP. BESIDE, AN ANIMAL'S HEAD WITH A HAND LICK, TO GET IT TO UNDEER STAND WHEN NO MEANS NO THE FIRST TIME.

BE SURE TO READ THE FIRST LETTER DATED 19, August 1996

Sincerely,
Vernon Carter

CARTER
CLADE 76133
H TX

ITEM
Home of...
ACHE OF TWO
Country since 1891
50¢



26 PAGES - 2 SECTIONS PLUS INSERTS

August 1, 1996

No flying here!

Air Force told

By Bob Litton
More than 30 area residents packed into the Brewster County Courthouse, Friday to voice their views regarding proposed military flight changes.

"This is not a done deal," U.S. Air Force Col. Kurt Cichowski repeated to the audience several times by way of emphasizing that their opinions could be impacting.

The proposal from the 49th Fighter Wing at Holloman Air Force Base near Alamogordo, NM, asks the FAA to approve three basic actions:

- convert six existing Cruise Missile testing routes into two low-altitude flight routes to be designated Instrument Routes (IRs) 102 and 141 for training American and German pilots;
- extend the western boundary of the Tolan Military Operations Area (MOA) in south central New Mexico and add a low-altitude MOA for air-to-air combat training by military aircraft; and
- establish an aerial refueling track in southwestern Texas where tanker aircraft can refuel planes flying along IRs 102 and 141.

The two routes would be covering basically the same air space — 620 miles long, 7 to 20 miles wide, and extending from 100 feet above the ground to 12,500 feet above sea level (6,000 - 8,000 feet above ground level, depending on the terrain). They are called two routes because planes would fly clockwise in one route (IR 102) and counterclockwise in the other (IR 141).

The IRs would traverse Hudspeth County from above Dell City, cut diagonally southeast through Culberson County, move along the northern edge of Jeff Davis and southern portions of Reeves and Pecos Counties, following basically the path of Highway 67 southwards to just north of Terlingua Ranch, cut back westward through the center of Presidio County, follow the northern bank



See FLYING Page 2A

FLYING

from Page 1A

Phantom II
One lady in support of the Border Patrol said, "I appreciate the defense provided by the Air Force, but we are involved in a drug war here, and the Border patrol is our first line of defense."

Several persons asked why the Air Force couldn't do its training over federal properties in the western U.S., where two-thirds of the land belongs to the government.

Cichowski responded that most of the western federal lands are controlled by agencies, such as the National Park Service, which don't want military aircraft flying over.

Moreover, going such a long distance westward would require repeated refueling, and the terrain in the Davis Mountains-Big Bend area is more varied and approximately 100 miles farther than the anticipated actual combat theater that the lands in the western U.S.

Also, he said, the air spaces around Holloman are already designated for flying missions by other installations. "The only way we can get to the target area," he said, "is to the southeast."

A lady representing one of the property rights groups asked, "How can you expect these people to accept over-flight when the federal government won't accept them in the west?"

One man said he saw the proposal as a threat to the clean air, quiet, wildlife and beauty of the area — and to his ranch. He said he intends to file a class action lawsuit to prevent the training routes from passing his ranch. He asked the audience to join him, and then he walked out.

While no one at Friday's meeting mentioned the fact that Germany was our enemy 30 years ago, Cichowski said that issue had been brought up at earlier meetings.

He pointed out that Germany is our staunch ally in Europe. Moreover, he said, we had also been at war with Mexico and Spain in the past. "How long does it take for an enemy to become a friend?" he asked.

A few citizens told Cichowski they appreciated the Air Force's mission and his coming to Alpine to answer their questions.

The environmental assessment statement is due to be submitted "around August 1," Cichowski said. If the FAA approves of the proposal and everything goes, the training flights should start in late October or early November, he added. "I wouldn't place any money on that."

One lady in the audience asked "what good punitive actions would do after the damage was done."

As for the Border Patrolman's concern, Cichowski agreed that the missions of the Air Force and of the Border Patrol were both important. "We're going to need to define what we can fly," he said. "The Air Force is going to have to prevent accidents happen. While none is acceptable, it is part

TWO OF TWO
49 FW/FA
490 FIRST STREET SUITE 2800
HOLLAMAN AFB, N.M., 88330-8287

FT. WORTH, TEXAS
19 August 1996

DEAR SIR:

I AM AGAINST ANYMORE "MOUNTAIN MEN"
AND LOW FLYING AIRCRAFT (MUCH BEFORE
SO ET RPTD OVER MY DEWELING - HELICOPTER
LANDING NEAR-BY AND ON THE W
EST CORP. ZON'S MOUNTAIN NEXT TO MY
PROPERTY?

THIS LAND, I BOUGHT OVERLY COUNTRY
WAS CLEARED AND ABOVE IT, AND I
HAVE MANY THOUSAND OF BOLLOR AND HAD
WARM TO TRY TO HELP MAKE IT PAY BACK
SOME OF MY MONEY. BUT BEFORE YOU
FOLLY DECIDE TO USE MY AIRSPACE -
THINK ABOUT THE ACCIDENTS (THAT USUALLY
HAPPENS IN ANY MILITARY OPERATION) TO THE
RESIDENTS - U.S. BORDER PATROL - GAME
WARRIORS AND SLOW FLYING AIRCRAFT THAT
IS ALWAYS IN AND AROUND MY MY PLACE

I HAVE EXPERIENCED THE EFFECTS OF
LOW FLYING AIRCRAFT IN SEVERAL TEXAS
COUNTIES AS I WAS HUNTING - THE DEER
SPROOK AND RUN THOUSANDS OF YARDS - AND
JUST ONE OR TWO FLY-OVER.

PLEASE HELP ME AND MANY MORE RES
IDENTS OF THIS AREA - I KNOW THE FEDERAL
GOVERNMENT OWNS MANY MILLIONS OF ACRES
IN ARIZONA ETC. - SO WHY DON'T THEY AIR
FORCE USE THEIR PROPERTY TO FLY-OVER?

Yours Truly,
David Carter

Protest To Air Force

This is to express my vehement opposition to the proposed establishment of Low Altitude Flight Routes IR 102/141, impacting southwest Texas.

Adverse Impact on Safety of Flight:

Mountainous SW Texas is rural with few roads traversing the area. As in Alaska, operation of civilian general aviation aircraft are vital for transportation and delivering supplies to isolated areas.

The mixing of slow single engine aircraft with jet powered tornadoes, F-4's, B-1's, and B-52's at low altitudes in this area which has no radar coverage will be deadly. The U.S. Border Patrol, which operates aircraft in this same area, has expressed this same concern. Due to

the topography of the area, avoidance maneuvers by military or civilian aircraft at low altitudes, could easily result in a collision into terrain, if not a mid-air collision.

Adverse Impact on Quality of Life:

People live in these rural areas not because it is convenient but rather because of its isolation, quiet tranquility, and so they can be one with nature.

The operation of low altitude flight routes with its attendant noise pollution, air pollution, disruption of animal habitats, and disruption of the natural tranquility of this area, cannot be allowed.

It is my understanding that these routes cannot be located in the western U.S. primarily because the NPS and other federal land owners object. It is unconscionable that the Air Force would try to impose this burden on private citizens because "the feds" do not want it over their land.

As a citizen in the process of moving to Alpine, I do not want it either and will work feverishly to not allow it to happen.

Seven 31, Posner

CAPT, U.S. Public Health Service



CHAMBER OF COMMERCE

(505) 437-6120 • Fax (505) 437-6334 • E-Mail: chamber@wazoo.com
1301 N. White Sands Blvd. • Box 518, Alamogordo, New Mexico U.S.A. 88311-0518

July 18, 1997

TO: Ms. Sheryl Parker, HQ ACC/CEVA
RE: Draft EIS, Expansion of GAF Ops at Holloman AFB, NM

On behalf of the 750+ business and individual members of the Alamogordo Chamber of Commerce, I am writing under the direction of the Board of Directors to convey our strong support for the expansion of German Air Force training at Holloman AFB (GAF II) and the development of a Tactical Target Complex on the McGregor Range. The German Air Force members and their families are contributing both economically and culturally to Alamogordo and Otero County. We are glad they are here, and we strongly support bringing over the additional 30 German Tornado aircraft and the additional military personnel and their families.

Also, we firmly believe Holloman AFB should have their own bombing range, and that the range should be placed at the most operationally advantageous location to both the German Air Force and current and future United States Air Force operations. We note that this planned expansion does not involve the taking of any private lands, does not involve turning public land over to the military, and for the most part, involves flight operations over existing military operating areas and previously approved low-level flight routes. Otero County and the other portions of southern New Mexico and west Texas have been designated for this type of training, and we are proud to contribute to our national defense.

Holloman AFB is critical to Alamogordo's and Otero County's economy. Our ability to capably host the German AF will set the stage for further international missions and prove our ability to meet future US Air Force needs. Alamogordo and Otero County have already invested both time and money into this effort. Please do not let a handful of ranchers and environmentalists destroy our economic base.

Sincerely,

Michael Dalby
Executive Director

"TAKING CARE OF BUSINESS"

Thursday, June 18, 1997

50 PHOTOS 2 SCALES PLUS MORE

Air Force encounters heavy flak

AIR FORCE

from page 1A

The Air Force Monday night brought its proposed plan to train German pilots in low flying missions over the area and encountered a heavy barrage of flak from area residents.

Approximately 60 persons attended the meeting at the Alpine Civic Center and one after another told Holloman Air Force Base representatives they were adamantly opposed to the plan.

Not a single person spoke out in favor of the proposal to expand the German Air Force mission by 30 additional Tornado aircraft.

This member would add to the 12 Tornado aircraft presently stationed at Holloman. These aircraft are not at this time flying low level routes over the Big Bend—Davis Mountain region. They are scheduled to begin this previously authorized flight within six months.

Low level missions with the 30 additional Tornados are not scheduled to begin until October 4, 1999.

But no matter when they are scheduled, now or later, the people at the meeting said "no way."

Purpose of the Monday night meeting was to explain the reasons for the Environmental Impact Statement, the area is well covered, the reason it is needed, how it will be accomplished and what is hoped will be the final outcome.

Col. James Huxford served as moderator for the meeting and representing the Air Force were Sheryl Parker, Langley AFB, Va.; Bob Johnson, Holloman AFB; and Lt. Col. Don Hargrove, Holloman.

"This not a done deal," Johnson said. "In fact, it may never be a done deal. The only reason we are here to do this EIS study and now when the public's response is so strong."

Stephen, hanging like a heavy cloud of carbon 1 and 2 emissions over the audience, greeted Johnson's "not a done deal" statement. "The strong support of governmental action."

SEE AIR FORCE PAGE 2

was played on the open floor when Mike White spoke. "Why is it when we tell the folks with a complaint it is not important enough to the next morning for them to call back? I have called and have yet to receive a call back from anyone. The Air Force wants more and more all the time. Where is it going to end?"

When graphically described a B-1 crash on the Chinese Mountains where he helped fight the Vietnam War, "You can't imagine the damage and the destruction. Mountains are being ripped."

Sen. Carney asked White's opinion. "The biggest problem is the cumulative impact. You have 12 aircraft now, and you say you are going to add 30 more. How many more will there be in the future?"

The question of "Why don't you do this flying over New Mexico where the government owns all the land?" brought an answer from Bob Jones of Dell City.

"The government does not own all of New Mexico," he said. "We own ranches in both New Mexico and Texas."

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"Isn't it right that property owners have rights to the airspace above their property? Has that been addressed in this EIS?"

The Air Force secretary pressed said: "You are right about airspace rights. But they do not extend into safety. This has not been addressed in this draft."

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Candidates total 25 for City Manager

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Deadline for applications ended June 30 and applications received totaled 25.

Applicants came from all parts of the economy, east, west, south and Texas, of course.

There are the present who have submitted applications for the position. Unless otherwise noted applicants live in Texas.

Kenneth A. Taylor, Taylor, Ding Lively, Alpine; Robert E. Francis, New Haven, Connecticut; Susan E. Thompson, Tracy, California; Frank L. Salvo, Llano.

Van, Arizona; Bonnie R. Loner Jr., San Antonio; Rex W. Shadock, Alpine; William R. Brown, El Paso; Carlos A. Salazar, Cincinnati, New Mexico; John J. Ding Arroy, Midland; John E. Miller, Midland; David L. Knapp, Midland; James R. Kene, Las Vegas, Nevada; James Davis Moore, Midland; Mike Keville, Cincinnati; Christopher T. H. Smith, Carroll, Kentucky.

Also, Coaches Terry, Pioneer Mountain, Stanley R. Schmitt, Clinton, Florida; Randolph A. Hoffman, Bellinger; John E. Day, Bagby/Brown A. Crawford, The Dalles; John C. Green, Austin; Ellen E. Davis, Yuma, Arizona; and Judy Miller, Uvalde.

No deadline date has been set for the final selection.

BRILLIANT DISPLAY



Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 07/18/97

I moved from the city to T or C to live in a clean, quiet
environment. The planes flying from the Air Force Base
destroys this.

You are taking away my peace in the name of peace.
It's wrong. Please don't.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Lillian Perry
ADDRESS: 312 N. Foch Street
CITY: T or C, NM 87901
STATE/ZIP CODE: 87901

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/10/97

I SUBMITTED COMMENTS & SPOKE AT
YOUR DELL CITY HEARING 7/8/97,
ATTACHED IS AN UPDATED COPY OF
MY COMMENTS THAT WERE SUBMITTED.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: W. H. MORRELL
ADDRESS: PO BOX 215
CITY: DELL CITY
STATE/ZIP CODE: TX 79837

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

7/9/97

COMMENTS ON THE NOISE ANALYSIS IN THE AF FINAL ENVIRONMENTAL ASSESSMENT (6/9/97) FOR ADDITIONAL GERMAN AF TRAINING FLIGHTS

Note: These comments are also applicable to the draft Environmental Impact Statement (EIS) dated June 1997.

1. BY FEDERAL LAW:

A. 42 USC 4901(b) states it is "the policy of the United States to promote an environment for all Americans free from noise that jeopardizes their health or welfare."

This is being violated, value of ranch property has dropped drastically, some sales have stopped because of the low level aircraft over flights. Lives of ranchers have been jeopardized because military airplanes are terrifying their horses resulting in dangerous rides thru/over boulders, gullies and bushes.

B. 42 USC 4903 states that Federal Depts., Agencies etc. shall comply with environmental noise laws to the same extent that any person is subject to such requirements.

But the increased low level flights violate OSHA regulations (see 2 below) as well as 42 USC 4901(b).

2. Each document does not clearly define aircraft speed for their noise data. Radiated aircraft noise increases exponentially (sharply) with aircraft speed yet neither report states what the maximum speed will be for typical altitudes (especially low altitudes). Since we now occasionally hear sonic booms and the AF recently paid for some broken windows, it's obvious that 480 knots is not the real world Max. Speed. The noise section is incomplete.

3. OSHA Noise Level violations- The EIS has an elusive statement on OSHA noise levels on page C-12. The Subject document states (page 4-9):

"OSHA has established permissible noise exposure levels (29CFR 1910.95) that establish thresholds in sound levels and duration of exposure at which hearing protection is required. Exposure below those levels are considered permissible. The cumulative amount of time per day that a person can be exposed to a noise level of 115dBA without hearing protection is 15 minutes. For comparison, the highest sound exposure a person could experience under the proposed action is 114dBA, for about 1-2 seconds...."

This statement appears incomplete and erroneous because:

A. The OSHA regulation cited above has additional requirements (section 1910.95(j)(3)) that seem to lower the hearing protection required threshold by 5dB for people with

hearing degradation. Approximately 70% of the men in the Dell Valley older than 40 have hearing degradation. Accordingly, often the OSHA requirement appears to be 110dB, not 115dB and the 114dBA level would seem to be in the hearing protection required for each exposure.

B. Page S-5 of the Subject Document states:

"Inadvertent overflights by PA-200s on MTR would generate single sound exposures levels of up to 112dB at 100 feet AGL."

Based on past performance there will be "inadvertent overflights" and when it's by an F-4 or a B-1, the sound level will be in the 130 dB range. (The AF documentation is inconsistent, one says 125db, another says 130 dB for an F-4 at 100 feet AGL, speed is not stated.) That's in the ear piercing range like what local ranchers and the Indians North of Kirtland AFB are complaining about (per the 7/7/97 edition of the El Paso Times).

These "inadvertent overflights" will continue to occur (one rancher said he could have roped the plane if his horse hadn't been wildly jumping around) and will violate the OSHA requirements and 42 USC 4901(b).

4. The AF sound level calculations consider atmospheric absorption (attenuation) of sound, but do not consider:

A. Cold air focusing of the sound. In the Dell Valley cold air pockets can make a 30+dB difference in the sound level of irrigation pumps 2000 feet away. In general noise levels would be much louder early in the morning than at mid day.

B. Reflection of sound off mountains. Low flights just west of the Guadalupe Mountains could have amplified sound levels because of the near vertical sides of the mountains reflecting noise. This could also be significant near other mountains in the area.

5. The AF noise calculations appear to be optimistic and incomplete:

A. There are no worst case calculations. When I worked for the USAF, engineering analysis always included worst case calculations.

B. Aircraft max. speed (and associated radiated noise) must be clearly stated. When I worked in Submarine noise reduction all the radiated noise data I ever saw stated the speed and depth parameters. The current document is a "trust us" approach, but the trust has been eroded away.

w-24

w-25

w-24

6. The Final Environmental Assessment Report states no supersonic flights are involved (page 4-3). The EIS states all supersonic flights will be confined to the White Sands Missile Range. Neither report seem to reflect the real world. As stated above we (north of Dell City) hear sonic booms about once a month, and the USAF just paid for some broken windows.

7. The AF noise calculation methodology averages noise over a 24 hour period. By the AF methodology an F-4 can scream along just off the deck at 135dB, then it's noise level is averaged in with 23 hours and 59 minutes of mocking birds singing and coyotes howling at 40dB. The reported level would be about 55 dB, a large misrepresentation. The methodology may apply to airports and neighborhoods with many flights. As used in the report, it completely masks occasional intolerably loud noise.

CONCLUSION - The proposed low level flights are in violation of Federal law and should be relocated. The noise will/is violating 42 USC 4901 (b) by jeopardizing health and welfare. Also per OSHA requirements all the ranchers in the area need to be issued ear protection devices and trained in their use. Also the noise data is incomplete and erroneous. The prior finding of no significant environmental impact should be rescinded. If there are any questions, I can be contacted by tel. at (915) 964-2487, Email:dmorr94028@aol.com, or PO Box 215, Dell City TX. 79837.

Wm H. Morrell
W. H. Morrell



GREATER LAS CRUCES CHAMBER OF COMMERCE, INC.

July 18, 1997

Air Combat Command Environmental
Analysis Branch
HQ ACC/CEVA
ATTN: Ms. Sheryl Parker
Langley Air Force Base, Virginia 23665-2769

Dear Ms. Parker:

It has just been brought to our attention that the Alamogordo Chamber of Commerce is putting forth a major initiative to support the expansion of German Air Force Training at Holloman Air Force Base (GAF-II) in Alamogordo, New Mexico. The entire Southern New Mexico area is very dependent upon the economic impact provided by facilities and personnel at Holloman Air Force Base, the McGregor Range and White Sands Missile Range (WSMR). The expansion of German Air Force Training would be a significant economic contribution to our regional economy and efforts.

The Greater Las Cruces Chamber of Commerce extends its fullest support with regards to this expansion effort including the development of a Tactical Target Complex on the McGregor Range. The development of GAF-II could only further add to not only our economic base, but also significantly enhance this region's contribution to our own national defense and further promote international cooperation.

Should you have any questions whatsoever regarding our fullest support of this effort, please do not hesitate to contact me directly at (505) 524-1968.

Sincerely,

Joseph A. Biedron
Joseph A. Biedron
President/CEO

cc: Honorable Pete Domenici, U.S. Senator
Honorable Jeff Bingaman, U.S. Senator
Honorable Joe Skeen, U.S. Congressman
Board of Directors, Greater Las Cruces Chamber of Commerce
Mr. Mike Dalby, Executive Director, Alamogordo Chamber of Commerce
Mr. R.B. Holmes, Chairman, The Alamogordo Committee of Fifty
Mr. John Stowe, The Las Cruces Forum & The Alamogordo Committee of Fifty
Mr. Tom Reeves, Publisher, The Alamogordo Daily News
Mr. Dave McColium, Publisher, The Las Cruces Sun-News

P.O. Drawer 519 - Las Cruces, New Mexico - USA - 88004-0519
Tel: (505) 524-1968 - Fax: (505) 527-5546
<http://www.lasnetnews.org>

THEONE OLIVER

PO Box 882
LA LUZ, NM 88337

Telephone 505-437-4258
Fax 505-437-4258

July 14, 1997

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews St. Suite 102
Langley AFB, VA 23665-2769

Dear Ms. Parker:

I am writing in concern of the public meeting held in Alamogordo, NM, July 12, 1997 regarding bombing range for Otero Mesa, for the German tornadoes.

First let me say, I am not a rancher or agriculturally affiliated. I am not from a ranching background. I am a business owner in Alamogordo.

I am very much against displacing American citizens and property owners for the sake of a foreign government. Would you be a good sport and give up some of your back yard to help the economy, and you would only have your privacy interrupted 4-5 times daily and property damaged occasionally?

My biggest concern is the EIS document drafted. This document is in violation of the NEPA act:
Sec. 1501.5-----Where appropriate the lead agency should seek the cooperation of state of local agencies of similar qualifications.

Sec. 1501.2
Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process to head off potential conflicts.

Otero county officials were not contacted or included in this process. What takes place in this county should have input from elected officials not enacted by a committee that is running over the citizens, prostituting themselves for the dollar.

At the meeting, Marion Thayer spoke on behalf of the Sierra Club, addressing the environmental impacts--destruction of the environment, spreading of noxious weeds due

to blast from aircraft, inability of wildlife to reproduce due to the disruption in their environment.

Two individuals spoke from the BLM quoting misinformation that is in this document. One of these individuals is out on that mesa 5 days a week, and knows first hand the impacts.

W-29 YOUR EIS HAS VIOLATED THE LAW AND THE RIGHTS OF AMERICAN CITIZENS.

Sincerely,

Theone Oliver
Theone Oliver

W-28

Brittany Club...Desert Trophy Hunters...Dada Ana County Associated Sportsmen...
 Fisheries Society...German Shorthair Club...Las Cruces Chapter Turkey Federation...
 Mesilla Valley Fly Fishers...New Mexico Shooting Sports Association...Organ Mountain
 Bismarck...Picacho Gun Club...Quail Unlimited...Wildlife Society...

SOUTHWEST CONSOLIDATED SPORTSMEN

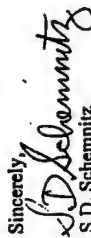
July 15, 1997

Ms. Sheryl Parker
 Headquarters Air Combat Command/CEVA
 129 Andrews St.
 Langley AFB, Virginia 23665-2769

Dear Ms. Parker:

Our organization, Southwest Consolidated Sportsmen (15 organizations, 1500 members) unanimously and vigorously support locating the German Air Force Bombing Range at a location other than Otero Mesa. We would like to see the use of existing bombing ranges or the Tularosa Basin site.

Otero Mesa is prime wildlife habitat that should continue to remain open to the public for recreational use. We would like to see the Otero Mesa remain undisturbed by a bombing range. Please maintain the wildlife habitat values of this outstanding area.

Sincerely,

 S.D. Schemnitz
 Chairman

XC: Joe Skeen
 Pete Domenici
 John Bingham

Draft Environmental Impact Statement Expansion of German Air Force Operations at Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: _____

McGregor Range at present provides little for any and but the military as it has few weeds. Discontinuation of this use is not likely. There isn't much use for the area if it were discontinued.

Consequently, McGregor Range should be fully utilized by the military to not do so is not wise.

Some species of flora and fauna may suffer but I notice that the flora is most affected by lack of rainfall and fauna by the lack of flora.

I think the bombing range is wise use of McGregor Range.

Personally, I would much prefer riding my ATV on McGregor, but this wouldn't help any, or else.

I repeat I favor the bombing range.
 CONTINUE ON BACK FOR MORE SPACE

NAME: Leonard Meeks
 ADDRESS: 537 Highway 70 West C-1
 CITY: Alamogordo, NM 88310
 STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
 HQ ACC/CEVA
 ATTN: MS. SHERYL PARKER
 LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: _____

*I believe in a strong military defense. I
SUPPORT HAFB. And any effects it makes
to expand.*

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Steven Fambrough
ADDRESS: P.O. Box 1507
CITY: Alamogordo NM
STATE/ZIP CODE: NM 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: _____

*I Support
You*

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: TOM SLAPE
ADDRESS: P.O. Box 2045
CITY: Alamogordo NM
STATE/ZIP CODE: 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: _____

I support this

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Denise Anderson
ADDRESS: Box 37
CITY: Alamogordo, NM
STATE/ZIP CODE: 885-434751

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCICEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: _____

I totally support the Air Force having
their own bombing range, which would
also allow for an expanded 30 German
Tornado aircraft, & 640 personnel to be
assigned to Holloman AF Base.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Tim Randall
ADDRESS: 3116 Stonelift
CITY: Alamogordo
STATE/ZIP CODE: NM 88312

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCICEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769



COUNTY OF OTERO

1000 NEW YORK AVENUE, ROOM 101
ALAMOGORDO, NEW MEXICO 88310-9835

COMMISSION/ADMINISTRATION

(505) 437-7427

DATA PROCESSING

(505) 434-4246

INDIGENT

(505) 434-4982

ROAD/GEOPHIC

INFORMATION SYSTEM

(505) 437-7836

FAX (505) 437-6542



State of New Mexico

County of Otero

1000 NEW YORK AVE., RM. 101
ALAMOGORDO, NM 88310-9835

August 1, 1997

By Facsimile

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley Air Force Base, Virginia 23665-2769

Dear Ms. Parker:

I appreciate the opportunity to discuss with you the issues surrounding the proposed expansion of German Air Force Operations at Holloman AFB, New Mexico. The Otero County Commission is supportive of an extension of the deadline to comment on this issue. These comments are being submitted in case we are not granted an extension. We reserve the right to officially modify them, if an extension is granted. Attached is a letter outlining Otero County's concerns in this matter.

Your consideration is appreciated.

Sincerely,

Romy Rardin, Chairman
Otero County Commission

August 1, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley Air Force Base, Virginia 23665-2769

Re: Proposed expansion of German Air Force Operation at Holloman AFB, New Mexico

Dear Ms. Parker

The following are comments and concerns regarding the proposed expansion of German Air Force Operations at Holloman AFB, New Mexico. The proposed expansion falls under the authority of the National Environmental Policy Act (NEPA) Public Law 91-190, 1969 40 CFR Ch V

Sec. 1501.5

Where appropriate the lead agency should seek the cooperation of state or local agencies of similar qualifications. (Otero County is significantly affected, and has requested involvement with no response)

Sec. 1501.2

Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, to head off potential conflicts.

1506.2 b

Elimination of duplication with state and local procedures, Public Land Use Plan, and Mini NEPA

1508.5
Cooperating agency (See 1501.5)

1505.2 a (2)
Limit the choice of reasonable alternatives.

1502.5
Timing

- W-30 1. Mitigation of tax burden and use of infrastructure, i.e., AUM lose, PILT monies, impacts on fire and sheriff, etc.
- W-31 2. Complete social/economic impact and mitigation to affected parties, i.e. County and Private
- W-32 3. Need for complete water and infrastructure study with short and long term affects addressed
- W-33 4. Needs assessment inadequate
- W-34 5. Incomplete information on using existing ranges
- W-35 6. Ft. Bliss is offering this land and does not have a range plan for McGregor that has gone through (NEPA) SEE. Range Plan April 1993
- W-36 7. Incomplete preparation in social science (human dimension) (See list of prepares)
- W-37 8. Otero County is not on the list of distribution or personal communications
- W-38 9. Draft Environmental Impact Statement to lengthy and not in plain language (See 1500.2a)
- W-39 10. Program scheduled and information not easily available, including copies of Draft Environmental Impact Statement

W-40 11. Otero County Custom and Culture, Public Land Use Plan Mini NEPA or ordinances not mentioned although supplied

W-41 12. Short-term and long-term uses not addressed adequately

13. Noise level ambiguous

Sincerely



Ronny Rardin, Chairman
Otero County Commission

RR/go

Box 21489

Carlsbad,

NM. 88220

10 July 1997

Dear Mr. Cantello:

I would like my name added to all mailings dealing with the proposed military expansion in the McGregor Range (Otero Mesa area).

I am totally opposed to this land grab by the military. It will deprive ranchmen, hunters & hikers use of PUBLIC LAND and provide a private play ground for the American & German military.

Sincerely,

Steve Webb

c 97 007

52/03

 08:51 1651-04-1997
 TOTAL P.03

*Draft Environmental Impact Statement
 Expansion of German Air Force Operations at
 Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 21 July 97

PLEASE PRINT I strongly support the planned expansion of the German Air Force Training Operations at Holloman AFB, including the additional 30 Tornado Aircraft, the development of a dedicated bombing range to support German AF training, and current and future USAF missions at Holloman AFB, and the continued withdrawal of McGregor Range Land.

This is not just for the German Air Force, although they provided the motivation and will provide 50% of the funding to develop the range. This range would ultimately act as an insurance policy to ensure HAFB's continued existence and support future missions.

The BLM is the major lobbyist against this project. They argue that the Otero Mesa Land should not continue to be withdrawn from BLM for military operations on the McGregor Range. What has the BLM done for Otero County, much less Alamogordo? How much have they contributed to our economy? Why do they send their experts from Las Cruces to our county and lobby against our economy?

I have lived in Alamogordo, when HAFB wasn't very active. A lot of people lost their jobs, homes, and everything else they had and most had to relocate to other cities. The ones of us that were still here owned property that was almost worthless and had to travel to other cities to buy things that weren't available here.

The economic impact of the German Air Force on Otero County is currently estimated at \$12 million annually. That is in addition

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Kenneth R. Grady

ADDRESS: 1403 Rockwood

CITY: Alamogordo

STATE/ZIP CODE: New Mexico 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement: [X]

Please Hand This Form In or Mail To:

 AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
 HQ ACC/CEVA

 ATTN: MS. SHERYL PARKER
 LANGLEY AIR FORCE BASE, VA 21665-2769

to the \$60 million in construction both on Holloman and in town. The economic impact of the expansion to GAFII is estimated at \$21 million annually and over \$100 million in construction on Holloman, plus the construction of the target complex and local construction. Lets support the insurance of BAFB, because without it Alamogordo would only be a city of half the size it is at present.

July 21, 1997

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, Va. 23665-2769

RE: Proposed Expansion of German Air
Force Operations at Holloman Air
Force Base

Dear Ms. Parker:

Even though I spoke at the hearing on the above subject at Alamogordo, due to the time constraints, I was unable to submit my full comments thus the reason for this response.

The distribution of the EIS wasn't made with a full disclosure to all parties and even with requests for copies of the EIS it is apparent that the Draft EIS will not reach requesters with sufficient time to study and reply by 8/4/97. For instance in the Alamogordo meeting over 80 people wanted and needed copies in order to reply and I received the only spare copy which I do appreciate.

The elimination of the Tularosa Basin Site due to \$20 million in expenditures is incorrect as the Tornado operation will pay for over 1/2 of the cleanup. In addition, Ft. Bliss has now been funded and bids are being let to clean up the site which eliminates the expenditure. In addition, the proposed gross misuse of the West Otero Mesa site is unacceptable due to the adverse impact on grazing and wild game.

Low level flights over the Otero Mesa would greatly impact it's use for grazing which has existed prior to the turn of this century. The noise and air wave wash at anything considered low level will damage livestock, wild game, windmills and other personal property. The economic impact on land values will be drastic and punish ranchers to a degree not comprehended by the study. For instance a 100 foot flight would only clear most windmills by about 50 foot and will physically rip the sail off. Horses and cattle will be stampeded through fences. The cowboys on horseback caught under these flights will be given the supreme test of bronc riding with physical harm more common than the exception (I've been caught in such a situation before with adverse results). In most situations we won't be where we can fully testify or verify the event that caused damage to cattle, fences, etc. but we can still see the results and suffer the economic destruction not to mention the most probable physical harm.



July 18, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23865-2789

Dear Ms. Parker:

The people of West Texas and Southern New Mexico are proud to support efforts which contribute to the defense of this Nation. The history of this region has demonstrated that we have welcomed and embraced a full range of military training activities and even today, the military is an essential part of our overall economic base.

At the same time, we also recognize the importance of our wide-open spaces to other elements of our economy. Farming, ranching and tourism depend upon the clean air, open sky and near pristine conditions of our rangeland. Additionally, many former residents are returning to this area from more congested and urban environments to enjoy the tranquility and isolation of this Region.

The expansion of Over-flight Operations from Holloman AFB into the Big Bend has the potential for significant negative impact on our land and our people. The level and extent of this impact is not completely understood and so must be approximated. This lack of understanding inhibits a thorough and scientifically credible discussion of the issues.

In an effort to advance this level of knowledge and understanding, the RGCOG would suggest that the Air Force and RGCOG coordinate to provide a clear and accurate demonstration of the fly-over impacts. We would propose that this demonstration be flown in Tornadoes by the German Air Force and observed by local elected officials, area decision-makers and members of the general public.

We believe that this effort would be most beneficial to the people of this Region and would provide the Air Force with valuable information and public input.

If you accept our suggestions, please contact our Executive Director, Justin R. Ormsby, at (915) 533-0998, at your earliest convenience to initiate the coordination effort.

1100 North Stanton • Suite 610 • El Paso, Texas 79902 • (915) 533-0998 • FAX (915) 532-9385

W-49 The flights over the Otero Mesa aren't only over BLM land but also include passes over private land as well as State of New Mexico lands with no consideration for either.


W-50 Otero County Commissioners were not properly consulted in the Draft EIS study which violates the NEPA process. It is with disdain that no Otero County Commissioner nor the Otero County Commission was included with the Draft EIS. The most impacted County in this study wasn't copied.

W-51 In summary, due to the lack of the following I have no alternative but to request the No Action Alternative:

1. Noise level
2. Wave Wash
3. Devaluation of Property
4. Personal Property losses
5. Wild game disturbance
6. Impact on human beings

W-52 Failure to include the Otero County elected officials in the NEPA process invalidates the study.

Sincerely,


Jim L. Coody
P.O. Box 247
Hemogordo, N. M. 88311-0247
Telephone: (505) 963-2383
Fax: (505) 963-2459

Thank you for your cooperation.

Sincerely,

J.B.R.

Jake Brisbin, Jr.
President, RGCOG

JBjr:JRO:pef

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/27/97

I strongly support the planned expansion of German Air
Force training operations at Holloman AFB. The
development of a dedicated bombing range to support
German AF training and current and future
USAF missions at Holloman AFB and continued
withdrawal of McGregor Range lands

.... CONTINUE ON BACK FOR MORE SPACE

NAME: Paul Stilwell
ADDRESS: 1221 Lonsdale
CITY: Alamogordo
STATE/ZIP CODE: N. M. 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Holiday Inn

ALAMOGORDO

BLAIR WALTERS

General Manager

1401 S. White Sands • Alamogordo, New Mexico 88310
(505) 437-7100 • FAX (505) 437-7100 Ext. 229

*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico*

ITTEN COMMENT SHEET

DATE: JULY 22, 1997

Thank you for your input.

PLEASE PRINT

Ms. Parker,

As the General Manager of the Holiday Inn in Alamogordo, I think it is safe to say that my entire staff is very supportive of the proposed expansion at Holloman Air Force Base. Not only does the base bring valuable income to the community of Alamogordo itself, but it is also very beneficial to my business in many ways.

Holloman Air Force Base provides me with excellent employees, whether they be military or civilian spouse and/or family. We are fortunate to host Christmas parties and other banquet functions that different aspects of the base have, and we also benefit greatly from Billie and relatives hotel stays. I look forward to the expansion of the base, and it's German population, as it is most definitely good for business.

I agree that there are many people against the proposed plan, but Alamogordo is a very small town and most people don't realize that there would be no Alamogordo if not for the Air Force. At least from this perspective, consider the Holiday Inn to be one vote for the plan, and if we can be of any further assistance do not hesitate to ask. Thank you.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Blair A. Walters, General Manager

ADDRESS: 1401 S. White Sands Blvd.

CITY: Alamogordo

STATE/ZIP CODE: New Mexico, 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-22-97

Being a Vietnam Vet and seeing many years of military service I strongly support the need for more of additional areas for training. Our area has always been a vital military exercise training and testing area and should always continue to be. The decrease in military spending and base closures just put the USA in a very bad position. It not only costs jobs, it puts people out for government handouts it puts our national security at risk. This is the best area in our country for training of R.D. & testing. Those that would oppose the expansion should take a second look at it. There are always some small individuals but when the German's are our main troops - use the area. It should be expanded to accommodate the 21st century.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: David H. Winberg

ADDRESS: 1106 Comanche Tr

CITY: Alamogordo

STATE/ZIP CODE: NMEX. 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-22-97

Bombing range over mesa is a great place for a bombing range which Holloman desperately needs. There are only 3-4 families living on the mesa and they are located far from the proposed bombing range. Most of them are protesting the range because of their ranches. That's an economic disaster. The government of Alamogordo will be greatly impacted by having this bombing range located like this in Holloman. A much more viable area in the community. I hear ranchers make you think this area is "thin" by far. Almost all of the land on the mesa is owned by the government. Much of it is a beauty under government control. One rancher who is a spokesman for the group. Owns a section of two of land but loses 100 sections from the government. Another loses 100 sections. I am in the government forming down very close to the base where they have 1.5 miles. The C-5s fly over our cattle all the time and have never hurt one of them. I have had the privilege of flying the Red Bull and was so high that I would not have seen any other planes. The highest and best use of that land is for a bombing range. Taking eight sections out of a total of 100 to 110 sections is nothing. This land will support only 10 cows per section. Besides the land is already controlled for military use.

NAME: Tom Reeves
ADDRESS: 29 Diablo Mountain
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 22665-2769

Victoria Copeland
3407 Thunder Rd
Alamogordo, NM 88310

July 22, 1997

Dear Sirs, madam,

I am writing this letter as a show of my continued support for the planned expansion of German Air Force training operations at Holloman AFB (Holloman II). I have lived here for sixteen years and have experienced the economic support HAFB brings to our city and county. I believe development of a dedicated bombing range will ensure and support any and all future missions at Holloman. It will create the anchor we need here to ensure our continued existence.

We depend on Holloman AFB, we like our German neighbors. We made a promise to them to support their mission. We need this bombing range. I'm all for it!

Sincerely,
Victoria Copeland

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-22-97

I strongly support the planned expansion of German Air Force training operations at Holloman AFB (CAF II), including the additional 30 forward aircraft, the development of a dedicated bombing range to support German AF training and support and future USAF missions at Holloman AFB and the continued withdrawal of McChessee Range lanes.

This position is not "just for the German Air Force". While they are providing the motivation & 60% of the funding for the range development, this range would ultimately act as an "insurance policy" to ensure that AF's continued existence & would support future missions

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Clydia Burkett
ADDRESS: PO Box 630
CITY: High Wells, NM
STATE/ZIP CODE: 88325

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-22-97

The Air Force's Acquisition of The OTEROMASIA ON THE McCREE RANGE FOR A BOMBING RANGE WOULD NOT ADVERSELY AFFECT ANY ONE EXCEPT THE GLM PEOPLE. THERE IS VIRTUALLY NO POPULATION.
The BOMBING RANGE WOULD INSURE THAT THE US AND OUR ALLIES WOULD HAVE ACCESS TO EXCELLENCE IN TRAINING FACILITIES.
THE TRAINING OF GERMAN PERSONNEL IS VITAL TO US TO CONTAIN THE BALANCE OF POWER IN EUROPE.

Derrell Ballard

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Derrell Ballard
ADDRESS: 2626 ST. ANDREW'S CT.
CITY: ALAMOGORDO
STATE/ZIP CODE: N.M. 88310

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 22 July 97

Thank you for your input.

PLEASE PRINT

I truly and strongly support the planned expansion of German Air Force training operations at Holloman AFB, NM 88330.

Additionally, I strongly support the development of a dedicated bombing range to support the German AF training and current and future USAF missions at Holloman AFB and the continued withdrawal of McGregor Range Lands.

Sincerely,
Paul J. Houghton
Alamogordo, NM

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Paul J. Houghton
ADDRESS: 1486 Challenger Ave.
CITY: Alamogordo
STATE/ZIP CODE: NM 88330

Mr. Paul J. Houghton
1486 Challenger Ave.
Alamogordo, NM 88310

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DATE: 7-22-97

Thank you for your input.

PLEASE PRINT

We have a bunch of members who own desert sections but can't afford more than \$100 sections. Government land comprising less than 1/2 of the needs 8 sections for training range. Light sections will pay \$100 but on the other side what is more important -- go down on the entire economy of Alamogordo. Without Holloman Air Force Base Alamogordo would become just another little desert town. About the size of Carlsbad. Holloman must have its own bombing range and there is not place more desirable and remote than the Playa Mesa. Further the bombing range will not limit the use of other parts of the area comprising with it is not just the Germans who need the bombing range. The real issue is the future of Holloman. We want it to be a bombing range. Holloman is not as competitive as land with other training or bombing range. Please support a bombing range for AF. Alamogordo economy is far more important than 3 or 4 sections. We would have right to use government land for a few years. This land is currently controlled by the military. What's the deal. Build Holloman's bombing range.

NAME: Tony Reeves
ADDRESS: 29 Cielo Mountain
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

I am also a former rancher. We own our land. We don't rely on the government to fur our land.

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Thank you for your input.
PLEASE PRINT

DATE: 22 Jul 97

It has been good for our community to have the German Air Force here at Holloman AFB, NM. I live in the Alamogordo community and I have heard nothing but good reports about their presence. Consequently, I believe we need to work together with the German Air Force so we can accommodate their needs as long as it does not conflict with any known community environmental problems. I would support the bombing range project since it is already a part of the McGregor Range and it would also meet the immediate needs of the German Air Force.

Carl D. Beagle

**** CONTINUE ON BACK FOR ... LE SPACE ****

NAME: Carl D. Beagle
ADDRESS: 1507 Mountain View
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Please Hand This Form or Mail To:

AIR COI T COMMAND ENVIRO NTAL ANALYSIS BRANCH
HQ ACC
ATTN: MS. SHE. PARKER
MCLEAY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-22-97

I am a retired military dependant living in Alamogordo, NM. Working in Alamogordo I have come to know many German Air Force personnel. They are a welcomed addition to our community. I am in favor of their continued presence in our community. Their expansion can be only positive. As for the range it is already designated a range. I believe the German expansion may even bring many needed jobs to our area.

**** CONTINUE ON BACK FOR ... LE SPACE ****

NAME: Patti Storm
ADDRESS: 8 Amelia Lane
CITY: La Luz NM
STATE/ZIP CODE: NM 88337

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Expansion of German Air Force Operations at
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Thank you for your input.

PLEASE PRINT

H.A.F.B. is the life blood of Otero County and
Chambers. It is imperative the German Air Force
be given the opportunity to expand in our
community. The G.A.F. has been a good neighbor
and will continue to bring much needed
financial stability to our community. Many of the
outside interests are not interested in our
Air Force, the German Air Force nor our
community. Please allow this very important
improvement in our community to continue.

DATE: 7-22-97

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JAMES T HYNES
ADDRESS: 4 ESCOBEDO
CITY: ALAMOGORDO
STATE/ZIP CODE: N.M. 88310

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Thank you for your input.

PLEASE PRINT

I highly recommend the increased use of
the McClellan Range for military use.
The small number of livestock and the
grazing of a few cattle is far outweighed
by the benefits economically to Holloman, Alamogordo
and the Pecos area.
As for the environmental impact, the area
will become richer if a Wren Warbler Sanctuary
were established and surrounding ranges
and more.
The surrounding areas from Wadsworth to
the Southwest area bases have all been damaged

DATE: July 22 1997

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Cliff Hall
ADDRESS: 822 N White Sands
CITY: Alamogordo, New Mexico
STATE/ZIP CODE: 88310

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Thank you for your input.
PLEASE PRINT

DATE: 7-22-97

I FULLY SUPPORT THE PROPOSED BOMBING RANGE
& EXPANSION OF GERMAN AIR FORCE OPERATIONS
AT HOLLAMAN AFB, NM.

Ken Rogers

NAME: Ken Rogers
ADDRESS: 2806 15th St
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/22/97

I strongly support the planned expansion of German
Air Force training operations at Holloman Air Force Base.
The subsegment of a dedicated bombing range to support
training. These developments will ensure HAFB's future
and the future of Alamogordo & Otter County.
The benefits to this area far outweigh the negatives.

I believe that continued development at HAFB and
White Sands Missile Range will help our community and
surrounding Area

NAME: Clifford C. Hall
ADDRESS: Box 496
CITY: Alamogordo, NM 88311
STATE/ZIP CODE: _____

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/22/97

DEAR SIRS,

IN REFERENCE TO THE HOLLAMAN AFB BOMBING RANGE, I STRONGLY SUPPORT IT REALIZING THERE ARE TWO SIDES TO EVERYTHING. THIS WILL BE A POSITIVE EVENT. AS USUAL, A SELECT FEW CAN SURE EATIE A STEAK BUT IF THE FACTS ARE REVIEWED, THE PICTURE BECOMES CLEARER. FOR EXAMPLE, MOST OF THE RANGERS WHO OBJECT EITHER ARE NOT EVEN RESIDENTS OF OUR COMMUNITY OR WILL NOT BE EFFECTED BY THE RANGE. SEVERAL CITIZENS FEAR THE EXPANSION DUE TO THEIR PAST (REMEMBER-ING THE GERMANS WERE OUR ENEMY IN WWII) OR DUE TO LACK OF KNOWLEDGE (BELIEVING THE PILOTS WILL BURY THEIR NAMES). THE FACT IS OUR COMMUNITY AS A WHOLE SUPPORTS HOLLAMAN AFB. THE GERMANS HAVE BEEN GREAT NEIGHBORS AND FRIENDS. WE HAVE AN "ALL AROUND" GREAT RELATION-SHIP AND LOOK FORWARD TO HAVING IT FOR THE NEXT 100 YEARS.

PLEASE, GIVE YOUR APPROVAL FOR THE BOMBING RANGE, FOR THE FUTURE OF OUR COMMUNITY, FOR THE FUTURE OF INTERNATIONAL RELATIONSHIPS.

THANK YOU
**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: BART GARRISON
ADDRESS: 1208 JUNIPER DRIVE
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88310

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WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7 22 97

Myself, Dennis and Neil Cummings highly support the German Air Force (CAFET). WE feel this not only will support the German Air Force but it will greatly influence the future missions of the United States Air Force.

Holloman Air Force Base is vital to the economic growth of Alamogordo. WE could totally support the bombing complex to be located on OASD-MESA. If this is the area that will best service the United States Air Force.

Sincerely,

Dennis Cummings

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Dennis and Neil Cummings
ADDRESS: P.O. Box 1093
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88311

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Thank you for your input.

PLEASE PRINT

DATE: July 28, 1991

While I have lived here for
Twenty Seven years, I have never
heard of Otawa Mesa before the Air Force
request to use as a new range. And I
am active in the Out doors. If it's
where I understand it is, Otawa mesa
is nearly inaccessible by normal means
of transportation. Meaning that it is
one of many similar areas in this high
desert in inaccessible and of limited
use. If the Air Force believes they can
utilize this area for training I believe
they should be allowed to use it.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Mike Haines
ADDRESS: 2351 Edaly
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒ X

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PLEASE PRINT

DATE: 7/22/97

I am in favor of the Air Force having their own bombing range
if it will enhance current and future USAF missions at Holloman
AFB.

I am also in favor of the training operations of the German Air
Force at Holloman AFB.

The military exercises by the USAF and the German AF do a lot
to support the economy of this area. I am in favor of it
continuing.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Robert G. Calkins, dba Alamo Axle Co.
ADDRESS: 601 First Street
CITY: Alamogordo, NM 88310
STATE/ZIP CODE: NM 88310

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/22/97

I strongly support the expansion of German operations at Holloman Air Force Base. As a native of Alamogordo and the owner of two businesses here, I have witnessed the positive impact the base has had on our community. The presence of military members, both American and German, has provided economic growth not only to Alamogordo, but to all of Otero County. In addition to the Las Cruces area. Local businesses and citizens depend on continued growth at Holloman Air Force Base, and are committed to support future missions and expansion there.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Norma Nelson
ADDRESS: P.O. Box 164
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Thank you for your input.

PLEASE PRINT

DATE: 7-22-97

I strongly support this. The German and American have more money than we are entitled to have. Conflicts.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: E. J. GARDNER
ADDRESS: 403 EAGLE DR
CITY: ALAMOGORDO, NM 88310-7717
STATE/ZIP CODE:



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of this is a sure
written response)

Draft Environmental Impact Statement
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Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 6/22/97

IT IS EXTREMELY UNFORTUNATE THAT THE DLM HAS CHANGED FROM A
LAND MANAGEMENT AGENCY TO A LAND PRESERVATION AGENCY. SINCE IT IS
NOT UNFORTUNATE THAT THE LAFB COVERED THE ENTIRE SUPPORT OF THE
DLM FROM BEING PUBLIC WITH HOWEVER AND REPORTS CONSIDERING EXPANSION
OF GERMAN AIR FORCE OPERATIONS AT HOLLAMAN AND ESTABLISHMENT OF A "SILENT"
AT HOLLAMAN. I BELIEVE THAT DLM WILL BECOME A SCRAM ANNUITY OF
ANIMOSITY FROM AN INTEREST AND THAT GROUPS OF SUPPLIERS OF USAF
AND OTHER AIRCRAFT OPERATIONS IN OTHER COUNTRIES. SINCELY SPEAKING THE
POPULATION HAS LONG SUPPORTED THE AGENCY AT HOLLAMAN, HOLLAMAN'S FUTURE

I STRONGLY SUPPORT THE PLANNED EXPANSION OF ONE REMAINS AT
HOLLAMAN AND THE ESTABLISHMENT OF A DESIGNATED "HOLLAMAN AREA" AS
HOLLAMAN. THE EXPANSION OF THE GERMAN OPERATIONS WILL BECOME
A MAJOR THE LOCAL AGENCY WHICH IS STRONGLY TOWARD EXPANSION
ON HOLLAMAN. THE AGENCY WILL NOT ONLY SUPPORT GERMAN OPERATIONS
BUT ALSO BECOME A MAJOR USAF OPERATIONS AS HOLLAMAN AND BECOME THE
NO BARRIER OF THE OWN. A FURTHER BARRIER OF THE OWNERS COULD BE
INFLUENCED BY THE FACT AS A DESIGNATED "HOLLAMAN AREA".

I AM NOT THE DLM I DO NOT KNOW THE PLANNED EXPANSION OF GERMAN
OPERATIONS AT HOLLAMAN, THE ESTABLISHMENT OF A DESIGNATED "HOLLAMAN AREA"
COULD BE A MAJOR THE LOCAL AGENCY.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: James L. Smith
ADDRESS: 3101 La Costa
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-22-97

THIS IS TO INFORM YOU THAT I AM IN SUPPORT OF EXPANDING
MC GREGG RANGE FOR USE OF THE GERMAN AIR FORCE.

AM AWARE OF THE IMPACT THIS WILL HAVE.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: EDDIE BEAGLES
ADDRESS: 1505 JUNIPER
CITY: ALAMOGORDO
STATE/ZIP CODE: NM MEXICO 88310

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Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 2-22-97

I support your study the new
bombing range for the Air Force. The
Commander have had a very positive attitude
on Alamogordo as well as in my district.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 2-22-97

I support this

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Tom Hernandez
ADDRESS: 818 N. 1st St. Suite 2
CITY: Alamogordo
STATE/ZIP CODE: New Mexico, 88310

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ATTN: MS. SHERYL PARKER

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**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Zucca News Stand
ADDRESS: 211 Tenth Street
CITY: Alamogordo
STATE/ZIP CODE: New Mexico, 88310

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/22/97

I fully support the expansion of a
dedicated bombing range for the German
Air Force. The effectiveness of our own
Air Force plus our friends is extremely
important to the world peace. An area
must be provided and used. The planned
area would be better used than what
is currently being used for.

The BLM hasn't managed our
Federal lands very well, in fact I
believe BLM should be eliminated and
save tax dollars.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Brian Nelson
ADDRESS: #37 Alamo Canyon Rd
CITY: Alamogordo N.M. 88311
STATE/ZIP CODE: _____

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Thank you for your input.

PLEASE PRINT

DATE: 7/22/97

We favor the proposed expansion of the bombing range.
New Mexico already has enough BLM land.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: FITZGERALD'S AUTOMOTIVE CENTER
ADDRESS: 801 SCENIC DR 437-2825
CITY: ALAMOGORDO, N.M. 88310
STATE/ZIP CODE: _____

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Thank you for your input.
PLEASE PRINT

DATE: 7/22

As a member of the Alamo Community,
I see a positive impact on our community
as our local military operations expand
I am in support of the bombing range.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/22/99

I strongly support the Air Force having its
own bombing range.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: ACENA Travel Inc.
ADDRESS: 800 E. Tenth St
CITY: Alamo
STATE/ZIP CODE: DM 88310

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ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JOHN EDDY
ADDRESS: 1201 10TH ST.
CITY: Alamo
STATE/ZIP CODE: NM 88310

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Thank you for your input.
PLEASE PRINT

DATE: 7-22-97

I SUPPORT THE DEVELOPMENT OF A DEDICATED BOMBING RANGE TO
SUPPORT GERMAN AF AND JRC MISSIONS. I BELIEVE THE RANGE WOULD
HELP ENSURE HOLLOWMAN'S FUTURE AND BENEFIT ALBUQUERQUE.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: SCOTT JUSTICE
ADDRESS: 2307 UNION AVE
CITY: ALBUQUERQUE
STATE/ZIP CODE: NM 87310

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
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WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 2256497

My only concern is Noise And Traffic. The road's here angulating mine and more parked with cars
+ trucks And the roads don't hold up to call here on the bank.
Other than this I fully support Holloman.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Adam Self
ADDRESS: 1704 Dewey Ln
CITY: Albuquerque NM 87310
STATE/ZIP CODE: _____

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WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

I SUPPORT THIS PROJECT.

DATE: 7/32/97

.... CONTINUE ON BACK FOR MORE SPACE

NAME: ROB HENLE

ADDRESS: 301 DOROTHY # 513

CITY: ALBUQUERQUE

STATE/ZIP CODE: N.M.

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ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/22/97

.... CONTINUE ON BACK FOR MORE SPACE

NAME: Tom WEDDER

ADDRESS: 7164 LIS Hwy 70 N

CITY: ALBUQUERQUE

STATE/ZIP CODE: N.M. 87310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACCCEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

To whom it concerns-

As a business manager of the Dodge County
Auditors committee, I support the continued
expansion of HAFB, and the further development
of our joint exercise with the German Air Force.

Thank You.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-22-97

I support the building of a
bombing range, and other country
a delegation, including the Co.
Commission plans an attack
Charming they were not considered a
This thing has been going on for
& they've had their head in the
sand.
Be as informative as possible
but tell them in a nice
way to keep good

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: James O'Grady
ADDRESS: Box 2022
CITY: Albuquerque, N.M.
STATE/ZIP CODE: N.M. 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/22/97

I fully support the HAFB Bombing Range. This
is doubly needed to support the German AF
training mission's future USAF missions

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Sherly E. Miller
ADDRESS: Box 476
CITY: Albuquerque, N.M.
STATE/ZIP CODE: N.M. 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: JULY 22, 97

PLEASE PRINT

I just don't know the environmental problems
well enough to approve or disapprove of the program.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: James Price Miss Irene Price
ADDRESS: P.O. Box 1287 P.O. Box 1287
CITY: Alamogordo, NM Alamogordo, NM 88311
STATE/ZIP CODE: New Mexico

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 7-22-97

PLEASE PRINT

I support the planned expansion of the German Air Force training
operations at Holloman Air Force Base (GAF II).

Any such expansion would have little, if any, negative impact on the
environment or the lives of the people living in this area. This is an
appropriate utilization of the territory.

Alamogordo and the surrounding communities in the Tularosa Basin, as
well as the whole state of New Mexico, have long been supportive of
military operations. I can think of no better place than Holloman Air
Force Base for the expansion of the German Air Force training operations.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Gregory M. Quinlan
ADDRESS: P.O. Drawer M
CITY: Alamogordo
STATE/ZIP CODE: NM 88311-7521

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

WRITTEN COMMENT SHEET

PLEASE PRINT

DATE: JUL 22 1997

PLEASE PRINT I Fully Support the U.S. Air Forces project to obtain their own Bombing Range in southern New Mexico and the addition and expansion of the burned Air Force at Holloman A.F.B.

In this time of Defense Funding cuts and personnel draw downs, it is critical to the National Defense to ensure the equipment and personnel are adequately trained and capable to respond to ~~a~~ a crisis situation.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME:

Howard L. Eberts

ADDRESS:

2205 Oregon Ave.

CITY: Albany

Alamogordo,

STATE/ZIP CODE:

CODE: New Mexico 88-310

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HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE:

7/22/97

~~Handwritten scribbles and symbols, including 'X', 'P', 'D', 'S', 'M', 'Y', and 'B'.~~

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: _____

u
w
f

ADDRESS:

900 g

CITY:

4 WD Cords, 1 M

STATE/ZIP CODE:

$$\frac{1}{N} \sum_{i=1}^N$$

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

LOCO CREDIT UNION

BOX 1743 • 808 WASHINGTON
ALAMOGORDO, NM 88311-1743

PHONE: 1-505-437-3110 • FAX: 1-505-437-5846
1-800-765-4130

TOOTS GREEN, CEO

July 22, 1997

Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, Va. 23665-2769

Dear Ms. Parker:

Holloman Air Force Base and the expansion of German Air Force training operations at Holloman AFB (GAF II), including the additional 30 Tornado aircraft, the development of a dedicated bombing range to support German AF training and current and future USAF missions at Holloman AFB, and the continued withdrawal of McGregor Range lands is very important to Alamogordo and to the economic impact of our county and state.

Our ability to support GAF II demonstrates our commitment to HAFB, our willingness to support future missions, and our ability to follow through on our promise to support German Air Force training.

I strongly support Holloman's position for the bombing range on the Otero Mesa land.

Sincerely,

Toots Green

Toots Green,
CEO

Serving School Employees in the 10 Counties of Carron, DeBaca, Guadalupe, Harding, Hidalgo, Lincoln, Otero, Scurro, Torrance, Union;
All Students in Otero County; Loving Teachers; All Retired School Employees

GREEN COUNTRY SUBDIVISION

JOHN L. GREEN
OWNER
1018 CANYON ROAD
ALAMOGORDO, NM 88310

Telephone 505-437-4377
Fax 505-437-5458

July 22, 1997

Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, Va. 23665-2769

Dear Ms. Parker:

As a land owner in Alamogordo and Otero County I am very much in support of Holloman's position on the McGregor Bombing Range. I strongly support the planned expansion of German Air Force training operations at Holloman AFB (GAF II) and the current and future USAF missions at Holloman AFB, and the continued withdrawal of McGregor Range lands.

The economic impact of the German Air Force on Otero County is currently estimated at \$12 million annually. This is in addition to the \$60 million in construction both on Holloman and in town (housing). The economic impact of the expansion to GAF II is estimated at 21 million annually and over \$100 million in construction on Holloman, plus the construction of the target complex and local construction.

Sincerely,

John L. Green
John L. Green
Owner

One other thing.

*Over the years I have been all over southern New Mex.
hunting, or just dropping around - I fear our land never
heard of "Otero Mesa". I can't believe these people
are making such a big deal of a place most had never
heard of - Some of these people have a lot of Name.*

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: July 23, 1997

As a member of the Alamogordo Chapter of Concerned and
residents of Otter County I would like to say I am in
favor of expanding training operations and development of
a dedicated bombing range to support German AF
training and future USSEF missions at Holloman as long
as it is not intended to be anywhere near any residential
area (visual or audio). The sacrifice of having to restrict
the remaining operations would far outweigh the benefits
to thousands of County residents economically and to nation
as a whole because testing and training are always
part of readiness for a fighting military.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Donald Dawdy
ADDRESS: 1508 10th St
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-23-97

Please be advised that I strongly
urge the development of the
expansion of German Air Force operations
located at Holloman Air Force Base
in Otero County, New Mexico.
It is vital that ours & German
military work together to form a
strong strategic defense relationship.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: R.A. Greene
ADDRESS: 1211 E. 10th St
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: July 22, 97

I strongly support the planned
expansion of the German training
operations at Holloman AFB, NM.
The selected bombing range to
support the German VAF training
and future USAF missions at Holloman
AFB, NM.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: July 22, 1997

I am writing in support of the air forces efforts to obtain a bombing
range for Holloman Air Force Base. I strongly support Holloman and
its efforts, especially in its role in training the German Air Force
pilots. A healthy and strong Holloman Air Force Base is essential
to a healthy and strong Alamogordo, NM.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Stephen E. McFarland
ADDRESS: 202 Ventura
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Drs. Larry And Nancy Starr
ADDRESS: 1211 8th Street
CITY: Alamogordo, NM 88310
STATE/ZIP CODE: 505-434-1500

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 22 July 97

I strongly endorse the plan to expand the capabilities of Holloman AFB through development of a new bombing range. This initiative will reduce the costs of training by cutting the fuel costs of training missions. Reduced fuel use means less atmospheric pollution and preservation of national petroleum resources. These benefits are in addition to the significant contribution the range will make to the local economy.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Paul T Burnett
ADDRESS: 1826 Lamar Circle
CITY: Alamogordo
STATE/ZIP CODE: NM 88310-4741

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Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-3769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 22 July 97

I support the expansion of the German aircraft presence at Holloman AFB.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Walter Staudts
ADDRESS: Rt Box 4
CITY: Alamogordo NM 88311
STATE/ZIP CODE: _____

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HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-3769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-22-97

OTERO FEDERAL CREDIT UNION STRONGLY
SUPPORTS THE PROPOSED BOMBING RANGE
& EXPANSION OF GERMAN AIR FORCE
OPERATIONS AT HOLLAMAN AFB, NM

Kent Gorman - Ken Roger
PRESIDENT
OTERO FCU

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: OTERO FCU
ADDRESS: PO DRAWER T
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88311

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: July 22, 1997

I strongly support the planned expansion of the German Air Force training operations at Holloman AFB NM (GAF II), including the additional 30 tactical aircraft, the development of a dedicated bombing range to support German AF training and current and future USAF missions at Holloman AFB, and the continued withdrawal of Mustangs from the range lands.

This range developed is not just for the German Air Force. This range will ultimately act as an "insurance policy" to ensure HAFB's existence and future missions.

The Southwest is suitable for those type of operations. The weather is ideal, clear skies and mild winters. Planes from other bases come to train at HAFB during the winter.

In 1995, Holloman AFB payroll and contracts accounted for \$257 million in expenditures and employed 4554 active duty and 1685 civilians. The economic impact is estimated at over \$400 million. The economic impact of the German Air Force on Otero County is estimated at \$12 million annually.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: DALE RITCHIE
ADDRESS: 3301 N. WHITE SANDS BLVD
CITY: ALAMOGORDO, NMEX
STATE/ZIP CODE: 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. (X)

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

I think that the EIS should not be conducted completely across the country from the study area. I would hope that you had plenty of hands-on contact with the area and its people. I cannot help but think that if the Air Force prints any false statements, then it is as liable to court martial and punishment as the person who commits a sexual offense of which we have many examples

WS7 *Ok yes, The Otero Mesa has the only concentration of the grama cactus in the world. Why do you want to put it in danger? Yes, it is more important than foreign military personnel.*

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-23-99

I strongly support the expansion of the German Air Force operations at Holloman Air Force Base, New Mexico.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Ramona Adams
ADDRESS: _____
CITY: RAMONA
STATE/ZIP CODE: 2915 N. WHITE SAGES BLVD
ALAMOGORDO, N.M. 88310

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 21665-2769

Regency Retirement Community
of Alamogordo



BOB FLOTTE
MARKETING DIRECTOR
(505) 437-4010

Newest Bank Building
Fax (505) 437-4112
1109 New York Avenue
Alamogordo, NM 88310

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

TEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-23-99

THE ADDITION OF THE GAF AT HOLLAMAN
HAS BEEN ONE OF THE MOST DYNAMIC CHANGES
FOR OUR COMMUNITIES. AS A
RESIDENT AND BUSINESS INDIVIDUAL, I FULLY
SUPPORT THE GAF, HAF, WAF, AND THE
ADDITIONAL REQUEST IF WAFS OF OUR
OTHER MESA FOR MILITARY OPERATIONS.

THE HAF, GAF AND WAF PERSONNEL
ARE THE REAL BACKBONE OF OUR FUTURE.
WITHOUT THE SUPPORT OF OUR MILITARY,
WE WOULD NOT BE SUPPORT FOR THE MILITARY,
WE COULD NOT THIS AREA OF SOUTHERN
NEW MEXICO TODAY.

I'M FULLY BEHIND THIS MILITARY REQUEST
AND WILL CONTINUE MY SUPPORT OF EARL
OF OUR MILITARY COMMUNITIES.

Thank you for REQUESTING MY COMMENTS.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: BOB FLOTTE
ADDRESS: 1505 CARRINGTON
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. (X)

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion German Air Force Operations at
Holloman Air Force base, New Mexico

WRITTEN COMMENT SHEET

Date: 23 July 1997

To Whom It May Concern:

As a small business owner, and retired Air Force officer, I strongly support the planned expansion of the German Air Force training operations at Holloman AFB and the development of a dedicated bombing range in support of USAF and GAF operations at Holloman AFB. Though the development of the range will require the withdrawal of land from the BLM this change of "ownership" reflects the best and highest use of the proposed land. I believe that BLM's mission is to manage national lands under their jurisdiction until a higher and better use has been identified. The proposed ranges have done that and BLM should not be allowed to prevent the progress and advancement of our community.

During this period of time when threats to our national security seem to be minimal, it is extremely important that we continue to maintain, expand, and improve our defense capabilities. Every conflict in which we as a nation have been involved, has inevitably been preceded by a period of decreased military preparedness. This decline in preparedness has occurred again and should a national emergency arise we will be thrust into a period of expensive, hurried mobilization with unacceptable casualty rates. The interaction and cooperation between the USAF and GAF in the development of the new bombing range will be a significant factor in the prevention of the errors we committed during past conflicts.

Economically, the impact of the additional GAF forces in the Alamogordo area will make a significant contribution to the sustained growth and cultural development of our community. The current members of the GAF have had a major influence in the expansion and improvement of the local housing market, retail facilities, and personal support systems. The additional unit will be most welcomed in continuing this improvement. Another consideration is that the co-location of the two GAF units will be a cost savings to the German government.

The military community is the prime economic source in Otero County economy. To fail to allow approval of the needed bombing ranges will be tantamount to signing the gradual demise of our community. Progress is inevitable, Alamogordo needs it, and I strongly support the proposed expansion.

Richard A. Carroll

Richard A. Carroll, Colonel, USAF (Ret)
Owner, Broker Alamogordo Realty, Inc.
2103 First St.
Alamogordo, N.M. 88310

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-23-97

The addition of a bombing range to the OTERO MESA of the McGRON BOWSE seems to be a logical progression for Holloman AFB & the bombing ranges on White Sands Missile Base. The new range would allow for expansion of training area that could only help the future of Holloman AFB and ~~the~~ ^{the} ~~entire~~ which will be a great benefit for OTERO County.

The small impact which the range will have on the environment is outweighed by the operational benefit to HAFB & the economic benefit to Otero County.

I have heard some people claim there would be a very negative effect on the environment. I have backpacked in the area on North White Sands Missile Range a few miles from a major bombing range. We observed plentiful wild life including Antelope, mountain lion tracks. We also observed cattle grazing in the area. Through those observations I would say the only environmental impact would be on the immediate area of the range.

I strongly support the new bombing range on Otero Mesa.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: GARY S. BEZIGES
ADDRESS: P.O. Dr K
CITY: ALAMOGORDO
STATE/ZIP CODE: NM, 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
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ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT "Bad things happen when good men do nothing."

DATE: 7-23-97

It is my personal opinion that somewhere along the line that this debate concerning allowing the German Air Force to add additional personnel to their force at Holloman has somehow been sidetracked into a revival of the old time and often emotional battle about "public" or "private" land.

I can see clearly our future if we have the means to continue to keep Holloman Air Force Base as a strong and viable force in our country as well as in our community.

There is no discussion about what happens when the current generation passes on that the next generation will feel as they do. It is a self-serving attitude to keep things as they are and all future generations will benefit from keeping Holloman strong.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Dorothy Watts
ADDRESS: 1811 College Avenue
CITY: Alamogordo, New Mexico 88310
STATE/ZIP CODE: _____

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-23-97

Thank you for your input.

PLEASE PRINT

I support this. It will be wonderful for our community.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: July 23, 1997

Thank you for your input.

PLEASE PRINT I am very much in favor of the Air Force bombing and practice range being proposed. As a resident of Otero County for nearly 50 years, I have watched Alamogordo grow from a small town of about 4500 people to a community of over 30,000. Most of this growth is directly related to Holloman Air Force Base.

As a former owner of ranch property in Otero County and a member of the New Mexico Cattle Growers Association, I feel the concern about noise impact on livestock and wildlife is totally unfounded. The animals get used to these sounds and don't really pay any more attention to aircraft than to thunderstorms.

The BLM, Sierra Club and local ranchers do not represent the majority of the Otero County residents. Ranching only represents about 7% of our population. The size of the land in question is so small, the overall benefits outweigh many of the concerns raised in the environmental study. This new range is necessary for the continued stability of Alamogordo/Otero County. Holloman is the basis for our economy and the addition of the German Air Force is very important for the business community. At present, I am involved in a number of business investments in Alamogordo so I am well aware of this and feel very strongly we need to support this cause.

Tommie Herrell

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Tommie C. Herrell
ADDRESS: PO Box 4338
CITY: Alamogordo,
STATE/ZIP CODE: New Mexico 88311

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Lorrie Heanue
ADDRESS: 3004 Sunrise Ave
CITY: Alamogordo,
STATE/ZIP CODE: NM 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-23-97

*I support the expansion of the
base at Holloman & development
of a dedicated bombing range.*

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-23-94

I support the New Bombing Range.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Tom Tarsen
ADDRESS: PO Box 614
CITY: High Wells NM
STATE/ZIP CODE: 88323

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-1769

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Big John R. Al. Macey mgc
ADDRESS: 7058 US Hwy 70 N.
CITY: Alamogordo
STATE/ZIP CODE: N.M. 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☐

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-1769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-23-97

I am for the German Air Force training operations at Holloman AFB.

I strongly oppose the continued withdrawal of Mc Gregor Range lands for military use.

I am sure there are areas on McGregor Range and on other lands that can be used for military purposes that are not grazing lands.

I wonder how long the Germans are going to be in the Pecos area? The residents and farmers have been and will be in the Pecos area for a long long time.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Charlie Cooksey Jr.
ADDRESS: P.O. Box 1021
CITY: Blawieganah
STATE/ZIP CODE: New Mexico 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-7769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: July 23 1997

I wish to express my support for the U.S. Air force securing their own dedicated bombing range.

I also wish to offer my support for German A.F. Training at Holloman AFB.

Their current and proposed expansion of Training is important to the local Economy.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Carla Gonzales
ADDRESS: 2200 Idaho Drive
CITY: Alamosardo NM
STATE/ZIP CODE: NM 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-7769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-23-97

We support the expansion

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Dave & Barb Sheld
ADDRESS: P.O. Box 1615
CITY: Alamogordo
STATE/ZIP CODE: NM 88311

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Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769



**State of New Mexico
House of Representatives
Santa Fe**

GLORIA C. VAUGHN
R-Otero County
District 51

503 East 16th Street
Alamogordo, NM 88310-6606
Home Phone: (505) 434-2819

COMMITTEES:
Consumer & Public Affairs
Judiciary

July 23, 1997

HQ ACC/CEVA/Attn. Sheryl Parker
125 Andrews Street, Suite 102
Langley Air Force Base, Virginia 23665-2769
Subject: Public Hearings-Draft EIS
Proposed Expansion of GAF
Holloman AFB, New Mexico

Dear Ms. Parker and Air Force Friends:

I attended your public hearing on July 12, 1997 in Alamogordo when you covered the Environmental Impact Statement and other matters related to the German Air Force (GAF) expansion in southern New Mexico. I also attended the scoping meetings in Mayhill and at the Holiday Inn in Alamogordo.

Although I didn't speak at your meeting, I am conveying some of my thoughts and concerns to you by this letter.

I am very conscious of the concerns many of my constituents have expressed over the expansion. These residents of Otero County, although they welcome the German Air Force personnel in their midst, are troubled about the expansion and what they perceive to be an intrusion into their lives and the impact the expansion might have on future generations, their livelihoods and property values.

Otero County is geographically a large county with many rural residents. Their main representation in government is through us, the county's legislators, who serve in the State Legislature in Santa Fe, and through their three elected County Commissioners.

I was deeply concerned with the July 12th hearing because our County Commissioners, our only elected county officials, appeared to have been excluded from the process of preparing your EIS documents and related plans for this expansion. Please ensure, as the process continues, that our citizens are heard from through their elected representatives and that public meetings with the county are held so that concerns may be shared and questions answered in a positive mode prior to public presentation of your studies.

It is my hope that you consider the concerns of the people of Otero County and do the right thing for everyone concerned.

Wishing you success in your endeavors.

Sincerely

Gloria Vaughn
Gloria C. Vaughn

cc: Gov. Gary Johnson
Otero County Commissioners
Alamogordo City Commission
Alamogordo Chamber of Commerce

W-58

WRITTEN COMMENT SHEET

DATE: 7-24-97

See Attached Letter

Page 11 Monday 06/06/00

... CONTINUE ON BACK FOR MORE SPACE ...

ADDRESS: 18 1/2 Leizona

1117 : 1117

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

ATTN: MS. SHERILL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Air Combat Command Environmental Analysis Branch
HO ACC/CEVA**

ATTN: Ms. Sheryl Parker

Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

I am writing in support of the expansion of the German Air Force training operations at Holloman Air Force Base and the development of a dedicated bombing range to support German Air Force training and related Holloman Air Force training operations.

Holloman AFB is critical to the economic viability of Alamogordo and the Tularosa Basin. Holloman AFB provides over \$257 million in economic benefits and employs approximately 4,554 active duty and 1,135 civilian staff. The total estimated economic value to Otero County is over \$400 million. White Sands Missile Range brings another \$223 million economic benefit with 650 active duty military staff and 3,964 civilian employees. The German Air Force adds another \$12 million in annual benefits to Otero County.

The presence of all these military families, both U.S. and German, vitalizes our community and contributes to the cultural diversity that makes New Mexico, particularly Alamogordo, such a wonderful place to live. While I am not expert on environmental impact of low level flights on the wildlife in the region, I would imagine that the proposed range would have far less of a negative impact on the environment than industries that have serious challenges with waste by-products that may pollute the soil and water. HAFB provides excellent neighbors and friends. I strongly believe that we need to continue to support our friends at HAFB and their continuing efforts to maintain an excellent training facility here in Otero County.

Sincerely,

Dr. W. W. Lundy

Carl W. Mantey

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 24 July 97

I SUPPORT THE USE OF THE McGRATH RANGE
FOR THE PLANNED EXPANSION OF GERMAN AIR FORCE
TRAINING OPERATIONS AT HOLLAMAN AFB.

THE EXCELLENT FLYING WEATHER IN THIS
AREA MAKES IT IDEAL FOR FLYING TRAININGS,
AND THE USE OF THE DESERT FOR A
BOMBING RANGE IS LOGICAL.

THE WHOLE IDEA MAKES GOOD SENSE
FOR US AND THE GERMAN - AND ADDS
TO THE CULTURE AND ATTRACTIVENESS
OF THIS AREA BY BRINGING IN
GERMAN TRADITIONS.

PUTTING MORE OF OUR DESERT TO GOOD
USE AND BRINGING MORE GERMAN HERE
TO ENLIVEN OUR CULTURE IS WONDERFUL
- PLEASE DO IT!

L. Dean Berry
MBA, M.S., MAT

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: L. Dean Berry
ADDRESS: P.O. Box 4001
CITY: Alamogordo
STATE/ZIP CODE: NM 88311

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Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/24/97

We fully support this program.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Jim and Dolores Griggs
ADDRESS: 2109 Cornell
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-27-77

I strongly support the use of the Otero Mesa for the new bombing range - the impact of the range and additional German personnel is such a positive impact to Otero County and surrounding areas that I don't even know why it's being questioned. I have found the German personnel currently assigned to HAFB to be extremely pleasant and polite neighbors & friends. This range is needed not only for German training but to insure the future mission of HAFB to America and the future of Otero County as a whole. Thank you and put me down as wholly in favor and support of HAFB and the new bombing range.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Matt Shaw
ADDRESS: P.O. Box 577
CITY: Alamogordo
STATE/ZIP CODE: NM 86310

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Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

AUBREY DUNN
P.O. Box 386
Alamogordo, New Mexico 86310

July 24, 1997

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

I'd like to express my strong support for the planned expansion for training operations at Holloman AFB (Holloman II) and the development of dedicated bombing range to support future USAF missions at Holloman Air Force Base as well as the German Air Force Training.

I am a native of and have lived in Otero County for 69 years. I have been over almost every acre of the proposed bombing range and was well acquainted with Mr. O. M. "Hop" Lee. Mr. Lee sold the land to the American Government in the Fifties. I am aware that he was in favor of this purchase by the U.S. Government as well. If you look at the records of 13 or 14 years ago, you will see that I supported the withdrawal for another 15 years, at that time, for multi-use purposes.

I'm still convinced that the best use for the MacGregor Mesa is continued involvement and multi-use by Holloman Air Force Base and any other uses which don't interfere with Holloman Air Force Base.

Some of the statements opposing this are being made by primarily ranching groups. I have known these people many years and I'm very disappointed by their position. There are so few families involved it is frightening to witness all the commotion they are making and all the visibility they have received.

Some of the ranchers feel they'll have the opportunity, within two or three years, to have total withdrawal. They feel they will regain use and have this land turned back to them for personal ranching interests. This thought is based on the Taylor grazing Act which has a lot to do with watering for the cattle.

Ms. Sheryl Parker
Page 2
July 24, 1997

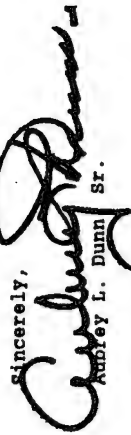
In addition, some people who have objected to flight patterns and flyovers have failed to mention that the majority of the land being ranched is either United States Bureau of Land Management or New Mexico state owned grazing land which they have leased at a very reasonable fee. They certainly do not own any air rights with their grazing leases.

I lived almost 30 years in Mountain Park, New Mexico. We lived under the turning pattern of most of the Air Force planes headed East out of Holloman Air Force Base. We certainly never suffered any hardships and we were proud Americans to have the Air Force planes flying over us.

Holloman Air Force Base is still down 4,000 jobs from its peak. The 600 German jobs under this proposed Toronado Bed Down would certainly boost the sagging economy in Otero County.

I sincerely hope that you Environmental Analysis Branch will take these comments under advisement and will come out with a favorable impact statement on our community and Holloman Air Force Base.

Thank you.

Sincerely,

Audrey L. Dunn Sr.

ALD:ld

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input
PLEASE PRINT

DATE: 7-24-97

Expanding the range doesn't make
a lot of difference to me however
after the last group of Germans
came our business went down at
it is still going down many of
us in Alamogordo aren't sure we
want another boom that cost us
business.

Second year retired USAF, when
I spent 6 years in Germany the
German government didn't take care
at all much less B.T. the AFR
at these military in the hospital,
dental clinic & commissary.

I think we have all the
German boom we need.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: John E. Arnold
ADDRESS: 2220 N. Florida Ave #51
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
 PLEASE PRINT

DATE: 7/24/97

I am completely in favor of the Air Force
 having their own bombing camp. As a business
 owner and contractor this will surely help the
 economy

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Mike Bolin
 ADDRESS: 0080x1486
 CITY: Alamogordo NM
 STATE/ZIP CODE: 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
 HQ ACC/CEVA
 ATTN: MS. SHERYL PARKER
 LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
 PLEASE PRINT

DATE: 7-24-97

I AM IN FAVOR OF THE EXPANSION OF THE
 BOMBING RANGE ON THE MESA SOUTH OF
 ALAMOGORDO, NM.
 I DON'T THINK IT WILL HAVE VERY MUCH
 IF ANY ENVIRONMENTAL IMPACT ON THE AREA.
 THE EXPANSION OF THE GERMAN AIR FORCE
 TRAINING FACILITY WILL HAVE A POSITIVE
 ON THE ECONOMY OF THE SURROUNDING
 AREA.
 AS A BUSINESS OWNER & HOME OWNER
 IN ALAMOGORDO I WHOLEHEARTLY
 SUPPORT THE LOCATION.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: WINFRED MCREE
 ADDRESS: 205 CANAL
 CITY: ALAMOGORDO
 STATE/ZIP CODE: NM 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
 HQ ACC/CEVA
 ATTN: MS. SHERYL PARKER
 LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 24 Jul 97

There is no doubt that Holloman AFB is the economic engine that drives Alamogordo and Otero County. Anything that can be done to enhance the missions at HAFB, within obvious reason, will result in a positive benefit to the residents of Otero County and Alamogordo. There are some opposing views on the expansion of the German AF operations, but I think the USAF has bent over backwards not only explaining the situation, but has done a remarkable and commendable job in modifying the proposed low level routes with the affected ranchers.

We need the expansion of the German AF and only with the proposed bombing range and low level routes on MacGregor Range are we going to help secure the current and future operations at HAFB.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Harold O'Dell
ADDRESS: 1334 N. Scenic Dr.
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒ [X]

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/26/97

I STRONGLY SUPPORT THE PLANNED EXPANSION OF GERMAN AIR FORCE TRAINING OPERATIONS AT HOLLAMAN AFB (HOLLAMANITE), THE DEVELOPMENT OF A DEDICATED BOMBING RANGE TO SUPPORT GERMAN AF TRAINING AND CURRENT AND FUTURE USAF MISSIONS AT HOLLAMAN AFB, AND THE CONTINUED WITHDRAWAL OF MC GREGOR RANGE LANDS.

I HAVE LISTENED TO ALL STATED CONCERNS AND I HAVE ATTENDED THE SERIES OF MEETINGS HELD FOR PUBLIC INPUT - I AM WELL INFORMED ~~AND~~ ON THE PROS AND CONS OF THIS ISSUE. AND ENCOURAGE THE EFFORTS OF THOSE DECISION MAKERS TO DO THE RIGHT THING AND VOTE TO CONTINUE WITH THE PLANS TO DIVIDE THE OTSPA MESA FOR THE EXPANSION/DEVELOPMENT OF A DEDICATED BOMBING RANGE.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: BARBARA Mc DONALD
ADDRESS: 68 MC DONALD RD
CITY: ALAMOGORDO, NEW MEXICO
STATE/ZIP CODE: NEW MEXICO, 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒ [X]

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/2/97

WE SUPPORT THIS ACTION TO HAVE A
DEDICATED TRAINING BASE FOR AFB

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-25-97

WE SUPPORT THE EXPANSION WHOLE
IT IS IMPORTANT FOR ALAMOGORDO'S PRESENT
AND FUTURE ECONOMIC GROWTH.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Associates Financial Services Ramon Gubser
ADDRESS: 712 E. 16th St. Ste. W
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JOHN A. WRIGHT
ADDRESS: 3508 Basswood
CITY: Alamogordo NM
STATE/ZIP CODE: 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

WRITTEN COMMENT SHEET

DATE: 7/25/97

I believe that a strong military defense and continued support of our neighbors at HAFB is important.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Dr. O.H. Marquardt
ADDRESS: 901 Filipino Avenue
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

FAIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACCICEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 11-5/97

But the German AF Operations at
HAFB and the RANCHERS IN OUR
AREA are extremely important
to Alamogordo. Sincerely hope
we can have an agreeable
solution for the expansion. Feel
the expansion is necessary for
the economy of Alamogordo and Otero
County.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Devethy O'Dell
ADDRESS: 1306 INDIANA Ave
CITY: ALABAMA
STATE/ZIP CODE: NA 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/25/97

I strongly support the dedicated bombing range to be utilized by the military.
The proposed bombing range will further secure the presence of Holloman AFB at its current personnel level.
This in turn increases the economic soundness of Alamogordo.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: John Dick-Peddie
ADDRESS: 1020 10th Street
CITY: Alamogordo, NM 88310
STATE/ZIP CODE: NM 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-25-97

I strongly support the planned expansion of German Air Force operations at Holloman AFB for two major reasons:
1. In this era of post-Cold War military operations, the financial impact of the Germans could prove to be substantial in Otero County.

2. This foreign nation presence in America will be another step in the eventual path to a unified world. The United World will benefit all mankind.

I believe the Federal System and its subordinate FLS program is important and will safeguard the long-term interests of Otero County.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Charley Kester
ADDRESS: 920 Hawthorn
CITY: Alamogordo, NM 88310
STATE/ZIP CODE: NM 88310

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ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 25 July 97

YES, I DO ~~NOT~~ RECENTLY SUPPORT THE
PROPOSED EXPANSION OF GERMAN AIR FORCE OPERATIONS HERE
AT HOLLAMAN AFB, N.M. AND ALL THAT IT ENTAILS, NOT
THE LEAST OF WHICH IS EXPANDED AIRSPACE FOR MILITARY
OPERATIONS AND AN AREA FOR BOMBING RANGE WITHIN
PTERO COUNTRY, NEW MEXICO.
THE REASON FOR MY SUPPORT IS THAT WITHOUT
A STRONG AND EXPANDING MILITARY PRESENCE WITHIN
THIS AREA THE ECONOMY OF SAME WILL REVERT TO
PRE WWII DAYS SHOULD THE MILITARY PULL OUT OF
HERE.

[Signature]

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Patricia V. Cronin
ADDRESS: 2310 - 19th St.
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769



RIO GRANDE CHAPTER OF THE SIERRA CLUB

606 Alto St.
Santa Fe, NM 87501
July 25, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, Virginia 23665-2769

RE: DEIS Proposed Expansion of German Air Force Operations
at Holloman AFB, New Mexico

Dear Ms. Parker:

McGregor rangelands are recognized as the historic site where New Mexico ranchers made their last stand against the military takeover through condemnation of private lands and public lands for the creation of White Sands Missile Range, Holloman AFB, and against the expansion of US Army Ft. Bliss T&NM. All supported the war efforts against the Germans and Japanese, and many sacrificed their homes for it. Some families saw their homes bulldozed down before their eyes, and their livelihood lost. The festering wound of these events still exists. Thus, the proposed action to take McGregor Range, particularly Otero Mesa grasslands, out of public access has historic and symbolic significance to New Mexicans. The history of this area is not included in your DEIS.

Hearings have been held in Las Cruces, New Mexico, since before 1972 on McGregor issues. Retired WSMR personnel, some now deceased, have testified that all the debris on Otero Mesa created by Nike-Hercules testing is non-toxic, not hazardous and involves no UXO. There have never been UXO incidents on Otero Mesa. Therefore, statements in this DEIS made to the contrary are notwithstanding.

For years the Sierra Club has held Annual Field Trips and Hiking Trips to the unique grasslands areas and upland areas of McGregor (so have other environmental groups.) The next Sierra Club Field Trip is scheduled for September 7, 1997. Since the roads to

1

3

Printed on Recycled Paper

w-61 Otero Mesa are not gated, we suspect your data for use of the area may be underestimated. Although we always acquire Permits to access the areas, many local residents are not aware of the need. There is no discussion of the recreational use of McGregor Range in this DEIS. The noise generated by low-level overflights of McGregor are analyzed based on information from urban airport settings or from helicopters, but there is no analysis of the impacts on the "wilderness values," the quiet, for which Otero Mesa is best known, and why people cherish the area.

w-62
w-63
w-64 Grazing has been an historical use of Otero Mesa and has been administered by BLM. The wildlife in New Mexico is owned by the State of Mexico for all, and regularly scheduled hunting seasons on deer in the uplands and antelope in the grasslands is administered by the State of New Mexico Department of Game and Fish. A description of these uses of McGregor, and the impacts on these uses are not discussed in this DEIS.


w-65 The Otero Mesa grasslands are unique as they have NOT been infested by creosote bush, and other non-native exotic plants, and mesquite. Otero Mesa is for New Mexicans what southern New Mexico was like before over-grazing at the turn of this century. The construction of a bombing range complex on McGregor grassland would involve the removal of vegetation over a very large area. This DEIS is in error when it states that native vegetation would return. It is a well-established biologic fact that shrubs and exotic weeds grow in area with disturbed soils, as you propose, of southern New Mexico. This type of infestation would have major impacts to the ecosystems, not only of Otero Mesa, but to areas east of McGregor and west Texas, and to the ranching industry.

w-66 The endangered aplomado falcon is dependent on tall yucca for nesting, not on grasses as your DEIS presumes. A major study has been commissioned by the Bureau of Land Management with New Mexico State University to determine why the endangered aplomado falcon have not been found nesting in the Otero Mesa tall yucca recently, or on the Tularosa Basin tall yucca of McGregor Range. Grasslands are not the limiting factor for aplomado falcon

w-67 nesting, the existence of tall yucca are. This proposed action would remove the tall yucca on which this species depends. The position of the Rio Grande Chapter is that the proposed expansions of German operations at Holloman AFB should use the Existing Ranges Option, as you describe in the DEIS, or construct new facilities on lands available on those areas.

Thank you for the opportunity to present Comments.

Sincerely,


John R. Buchser
Chair
Rio Grande Chapter
Sierra Club

cc: William Cohen, Sec of Defense
Marianne Thaeler, Military Issues Chair, Sierra Club

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 26 July 97

I support the planned expansion
of German Air Force training operations at
Holloman AFB.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-27-97

We strongly support the planned expansion of German Air Force
training operations at Holloman AFB (Holloman II). The development
of dedicated bombing range to support German AF training and
current and future USAF missions at Holloman AFB, and the
continued withdrawal of McGregor Range lands.

The Germans in our area have made a great economic
impact. Construction on and off base military exercises
fill our motels and restaurants during their operations.

We believe it would be to Alamogordo best interest to
expand the German AF Through (Holloman II)

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Veronica Walker
ADDRESS: 2502 Eastmont Ct
CITY: Alamogordo
STATE/ZIP CODE: N.M., 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. (☐)

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 22665-1769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Greg and Sheila Dauten
ADDRESS: P.O. Box 3782
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. (☐)

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 22665-1769

R.B. Holmes
President and
Chief Executive Officer
Norwest Bank New Mexico, N.A.
Alamogordo Office
1109 New York Street
Post Office Box 638
Alamogordo, New Mexico 88310
505/437-6010

NORWEST BANKS

July 28, 1997

Ms. Sheryl Parker
Langley Air Force Base
Langley AFB, VA 23665-2769

Dear Ms. Parker,

I am writing to you in support of the Air Force's expansion to have their own bombing range on or near the Otero County Mesa in Otero County New Mexico.

I have been a resident since 1964 and I was even stationed at Holloman Air Force Base. Our local economy is almost entirely dependent upon a strong presence at Holloman Air Force Base. The opportunity for the Air Force to have their own dedicated range is a major bonus and ensures, to some extent, the stability of the Air Force at Holloman AFB. The added benefit of an additional 30 German Tornado Aircraft and 640 assigned personnel will be a welcome addition to our community.

I can tell you that our German friends are good neighbors. They have integrated well into our community and are a welcome addition to our town.

I have attended many meetings regarding the bombing range for the Air Force. A number of people have expressed their concern and dislike of the Air Force flying low over their houses and themselves. Some have advocated throwing German's off of our soil and criticizing them for flying their flag in front of their headquarters, which is very embarrassing.

I have visited with many, many business people in our area. Each of them echo the fact that we desperately need a strong national defense. The expansion of the Air Force to have their own bombing range will help ensure this.

Please, support the expansion of the Air Force having their own bombing range.

Sincerely,



R.B. Holmes, CLBB
President and Chief Executive Officer

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 7-28-95

PLEASE PRINT

I support the project

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: R. B. Holmes
ADDRESS: 2405 Lincoln Ave.
CITY: Alamogordo, NM
STATE/ZIP CODE: 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 2-2-89

Holloman AFB is essential to Alamogordo. Holloman has been a good neighbor for many years. Add Big Impact on our town. I support the German Personnel Addition. The new bombing range would do good for many.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Rock Williams
ADDRESS: 37 Ivy Lane
CITY: LA Jolla
STATE/ZIP CODE: 92037

Please check if you would like to receive a copy of the Final Environmental Impact Statement. | |

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/28/97

We are in favor of the Air Force having their own bombing range. We feel it is necessary to have a strong military defense. Holloman Air Force Base is a threat to our defense and community.

Graciel

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: The Aristocrat Restaurant Center (Dulles)
ADDRESS: 2522 Parker Bradley
CITY: Alamogordo
STATE/ZIP CODE: 7m 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-28-97

Thank you for your input.
PLEASE PRINT

I totally support the growth of
NAAB; the surrounding community.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: MARY C. RICHARDS
ADDRESS: 2412 BUCHANAN DR
CITY: ANNAPOLIS, MD
STATE/ZIP CODE: 21403

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-28-97

Thank you for your input.
PLEASE PRINT

I strongly support the Air Force
having their own bombing range

Donna H. Hearn

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: _____
ADDRESS: _____
CITY: _____
STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-28-97

I am writing to express my support of the expansion of German Air Force operations at Holloman Air Force Base. I also support the expansion of the Air Force Tornado project.

MARIANNE H. THAELE
2015 Huntington Drive
Las Cruces, New Mexico 88011-4931

July 28, 1997

Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB
Virginia 23665-2769

RE: Draft Environmental Impact Statement (DEIS) Proposed
Expansion of German Air Force Operations at Holloman AFB, NM

Dear Sheryl Parker:

Thank you for the opportunity to present Comments on the DEIS for the "Proposed Expansion of German Air Force Operations at Holloman AFB, NM."

Only recently did I become aware that: when I was inadvertently left off the HAFB Mailing List for this DEIS, and HAFB arranged that a copy be sent to me by your contractor SAIC, and SAIC sent me a xerox copy of a document entitled "Proposed Expansion of German Air Force Operations at Holloman AFB, Draft Environmental Impact Statement," and I read said document learning that it did not have the Appendixes, and I requested the Appendixes from SAIC, and I received a blue cover copy of a document entitled "Proposed Expansion of German Air Force Operations at Holloman AFB, Draft Environmental Impact Statement," which I presumed was a duplicate of what I already read but with Appendixes, and I read the Appendixes, did I learn that the original xerox copy I had been sent and read was NOT the same as the blue cover copy I had received, and is probably a very early draft. Therefore, I requested a Deadline Extension via telephone to you Sheryl Parker, and to Capt. Larry Cox HAFB, and through US Senator Jeff Bingaman's office. Having not heard that my extension request has been granted, and I leave on a long planned trip July 31, 1997, I must limit my Comments to the "Range Master Plan Fort Bliss Texas 1993" (a related document), the DEIS Executive Summary, and the obvious DEIS omissions I can hurriedly note. And, reserve the right to present additional Comments after the Deadline if I deem it necessary.

These Comments, attached, are divided into three Sections.

Section I: covers potential cumulative impacts and/or conflicts with plans set forth in the US Army "Range Master Plan Fort Bliss Texas, April 1993" (prepared by the Army Corp of Engineers, Contract No. 63-90-D-0061, Delivery Order No. 0043, April, 1993).

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: B.L. Mathews
ADDRESS: 918 14th St
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Section II: covers information and analysis in the DEIS Executive Summary. And,

Section III: covers additional information that should be analyzed in the DEIS and should be reflected in the Executive Summary.

Again, thank you for the opportunity to present Comments. Please see Comments attached.

Sincerely,

Marianne H. Thaeler
 Marianne H. Thaeler
 2015 Huntington Dr.
 Las Cruces, New Mexico 88011
 phone/FAX 505-522-3421

ATTACHMENT: COMMENTS TO DEIS

COMMENTS ON
 PROPOSED EXPANSION OF GERMAN AIR FORCE OPERATIONS
 AT HOLLOMAN AFB, NEW MEXICO
 DRAFT ENVIRONMENTAL IMPACT STATEMENT

by Marianne H. Thaeler
 2015 Huntington Dr.
 Las Cruces, New Mexico 88011
 phone/FAX 505-522-3421

INTRODUCTION

It is unclear from this NEPA process, who would be responsible for what?, if the proposed expansions came to fruition under any of the options analyzed in this DEIS. The lands of McGregor Range are presently managed under P.L. 99-606 by the Bureau of Land Management and US Army Ft. Bliss. Neither the GAF nor the US Air Force appear to have any legal authority, laws, Agreements, Memoranda of Understand, etc. on the lands of McGregor. But, the US Army Ft. Bliss does have a Master Plan for the area, which did not go through the NEPA process, but which is guiding its activities. And, BLM has plans to cover their management responsibilities.

Even before the "Range Master Plan for Fort Bliss, 1993," southern New Mexico and west Texas residents had come to believe there was/is an orchestrated attempt by the US Department of Defense, and/or foreign governments the US Military Services sponsors, to annex an additional 608,385 acres of lands (McGregor Range, an historic geographical location name) to existing military installations in New Mexico and Texas. The public presently has access to over 272,000 acres of this land, Otero Mesa grasslands and uplands, which is presently managed by BLM under Multiple Use for hiking, biking, picnicking, camping, hunting, bird watching, grazing, and especially wildlife watching. The roads to access the area do not now, and have not had gates. Although access permits are required by the US Army Ft. Bliss, this requirement is not enforceable. These lands are the site of the proposed West Otero Mesa option.

The use of baseline FY 00, presupposes in violation of NEPA the temporary withdrawal of McGregor will be renewed by Congress.

SECTION I

The name, "West" Otero Mesa option, leads one to believe there is an "East" Otero Mesa proposed bombing range site. Said site is described in the "Master Plan Fort Bliss Texas" (1993) at pg. IV-2, section 4.2, and page IV-4, Figure IV-2, describes a proposed Class-C Bombing Range to be located east and north of the DEIS proposed West Otero Mesa option, for the countries of Germany and Taiwan. (page IV-2 4.2 para 1).

This DEIS must consider the cumulative impacts and environmental effects of this US Army proposed bombing range.

A critical factor for any bombing range(s) and/or bombing range complexes (NRC) is radar coverage. Radar coverage in not covered by this DEIS, and it must be.

According to the Fort Bliss Master Plan at pg. IV-15, last paragraph:

".... Fort Bliss has proposed a new site to be installed on a hill below the Sacramento Mountains. The purpose of this additional site is to allow complete radar surveillance within the airspace over Otero Mesa. Currently there is a shadow east of the raised lip of the mesa where WSMR ASR-9 (to be the primary surveillance radar for Ft. Bliss ranges and training areas) cannot track aircraft or drones. The additional radar site to the north would cover this area as well as provide better coverage over all of McGregor Range through consolidation of radar coverage."

The majority of Otero Mesa to the best of my knowledge continues to be in a radar shadow. Personal conversations with Ft. Bliss personnel indicated to me the ideal site for this radar facility would be in the Culp Canyon WSA. Under present law, this would be illegal. It is true that over 10 years ago BLM did not recommend to the then Congress this area for permanent wilderness designation. But Culp Canyon continues as a WSA and must be managed under the Wilderness Act. Your statements such as at DEIS pg. 3-38 para 3 should be deleted as out of date.

Radar coverage of West Otero Mesa and Tularosa Basin options are not analyzed as part of this DEIS, and should be.

To the best of my knowledge the footprint for the Ft. Bliss Biggs Air Field may cover portions of the Tularosa Basin option. This is not analyzed in this DEIS and should be.

According to the Range Master Plan Fort Bliss Texas, April 1993, page III-6, top,

"In the future, McGregor Range is scheduled to support firings of THAAD and Multiple Launch Rocket Systems (MLRS) weapons systems."

The THAAD system is presenting being tested at WSMR. WSMR has used Ft. Bliss lands for missile launches in the past, and we have no reason to believe WSMR will not do so in the future.

SECTION II

Paragraphs of the Executive Summary (ES) should be re-written to correct. add or delete the following for accuracy and candor:

ES-3 para 1. Add: The FY00 baseline has been chosen, or can be construed to be chosen, because the temporary withdrawal of McGregor Range expires in year 2001 under 1986 Public Law 99-606.

ES-3 Add: Increased noise at HAFB will require - that areas of White Sands National Monument must be closed to camping (ES-4 para 1), and

under the NTC options noise will require

- buy outs of resident ranchers and their employees presently living east of McGregor Range (ES-4 para 3 and 4), and

under low level air space modifications, noise will require - buy out and damages to residents in the area of Carrizozo, New Mexico where training routes over lap, and

under supersonic high altitude airspace modifications, sonic booms in central and western New Mexico and eastern Arizona will require

- damage payments for loss or damage to property or animals, commercial and domestic. (Some damages have already been confirmed)

ES-4 Add: All roads off SR 506 on Otero Mesa and the Otero Mesa uplands do not have and have not had gates. So, although public access by the Army is by Permit only, this permit system is not enforceable. These areas have traditionally and are now managed by the Department of Interior. Bureau of Lands Management for grazing, hunting under the control of the State of New Mexico Dept. of Game and Fish, picnicking, camping, hiking, bird watching, wilderness solitude and quiet, biking, and particularly wildlife watching. These public activities and uses will be severely restricted or will become incompatible uses under the proposed action.

ES-5 The one sentence FONSI, finding of no significant impacts to lands use, at ES-5 para 2 should be deleted as untrue. See comment above ES-3.

ES-5 para 3. Although HAFB presently cleans the Existing Ranges targets every 2 months (DEIS pg. 3-75, para 4), and inert ordnance twice per year (3-76 last para), the NTC target areas would only be cleaned up annually. All clean up requirements should be the same.

ES-5 para 4 and 6, last sentences, these FONSI statements should be deleted as either untrue, lacking data proof, or inconsistent with available information. The prevailing winds are to the south and southwest toward the abutting lands of the City of El Paso, Texas, whose air shed is in non-compliance with existing NAAQS for particulate matter.

ES 6 para 5 last sentence regarding sortie response by wildlife should be deleted. Fear responses analysis were not included in this DEIS and should be. This DEIS relies entirely on analysis of startle reflex, and lacks any analysis of Fear Response. Tornado jets induce fear responses to both humans and wildlife, making

FONSI type statements and conclusions related to wildlife response inappropriate in this document as written.

ES-8 Water and Resources and ES-10. Utilities. should include: The existing shallow pipeline on Otero Mesa has a "y". One branch provides the only potable water to the Village (Town) of Oro Grande, New Mexico, located on Hwy 54, and the other branch provides water for livestock and wildlife. Neither branch has water pressure for construction, nor fire fighting required pressures. Water is required as standard construction procedure in southern New Mexico to settle dust and compact the soil for construction. Water is not available for these purposes.

ES-9 Add: The cumulative impacts would be significant from closure of State Road 506. This road is presently closed intermittently to accommodate year round live fire Patriot missile exercises by the Japanese at Ft. Bliss, and spring live fire exercises by NATO nations following Roving Sands training in the spring. The added road closures from the proposed actions would isolate the residents of Timberron, Pinon, and Weed, New Mexico and the rural residents east of McGregor from the County Seat in Alamoqordo, NM.

ES-9 Add: Hwy 54 between Alamoqordo, NM, and the main metropolitan area of El Paso, Tx, must be widened to 4 lanes sooner than anticipated by the State of NM Highway Department. This widening is needed to accommodate the anticipated addition traffic generated by the increased population of Alamoqordo, NM, as a result of the proposed action (relocation of 640 personnel to HAFB.) Also, the training routes which would exit NTC options may create traffic safety problems requiring mitigations - warning signs for low flying aircraft, and reduced speeds.

ES-9 and 10 Utilities. Add: Potable water may not exist to meet Peak Summer Demands for the City of Alamoqordo and HAFB proposed housing expansions.

- Peak Summer Demand is not analyzed in this DEIS and should be. It is the standard measure used by Water Utilities to measure demand requirements.
- Peak Winter Demand for natural gas is not analyzed in this DEIS and should be.
- The Bonito Pipeline, which once provided water to the City of Alamoqordo, is no longer functional, and may not be adequate to meet the peak summer demands in the area if it were.
- Existing HAFB dedicated wells have shown the first signs of brine back-wash from heavy draw downs. There are no assurances that redrilling of existing wells will find potable water that will not be similarly effected. All wells at WSMR Headquarters presently are unusable, because the water is brine.

ES-10 para 4 sentence 1. Delete FONSI as untrue. Add: The removal of vegetation on proposed West Otero Mesa site will mean permanent loss of shallow top soil. Because the region experiences severe spring sand storms and wind erosion, vegetative cover is a prime factor in air quality. The soils are dependent on vegetation. Thus the use of inert munitions will impact soils through loss of top soil.

ES-10 para 5. Delete last sentence. Soil is not "created," but blowing particulate matter is created.

ES-10 para 6. last sentence. Delete. Top soil loss is permanent in these fragile desert lands.

ES-11 para 2. Delete last sentence; or modify to "White Sands Ranges," as I do not know under whose administrative jurisdiction the reported Roving Sands associated crashes and tornado crashes occurred.

ES-11 last para should be rewritten to reflect accuracy and candor. The method of analysis FY 95 to baseline FY00 is flawed.

ES-11 last para line 5. This sentence should be deleted as inaccurate. The lists that follow should be corrected, because

- There have been recent cumulative impacts, crashes, that may be related to air space management and safety.
- Construction does add particulate matter to an air shed that is already out of compliance with NAAQS for particulate matter, and thus has cumulative air quality impacts.
- Archaeologic, Cultural, and Historic Resources could be impacted (see ES-7 para 5 line 7).
- Hazardous Materials and Waste Management will impact the soils and the only water distribution systems on the NTC West Otero Mesa site, including cumulative impacts from fires generated naturally from outside the site by lightning strikes.
- Increased numbers of aircraft in already crowded airspace will create safety cumulative effects.
- Because of the number of new temporary residents in the area, there will be cumulative impacts on Utilities due to increased summer peak demands for water, and increased winter peak demands for natural gas.
- There will be impacts to transportation routes, both SR 506 and Hwy 54.

- There will be cumulative impacts to soils and associated natural vegetation from revegetating creosote and noxious weeds. Fort Bliss does not participate in the federal Noxious Weed Eradication and Control program.

SECTION III

Herein please find additional information that should be included and analyzed in the DEIS and should be reflected in the Executive Summary.

MITIGATIONS

This DEIS does not include reasonable mitigations of known impacts and cumulative impacts. This is a glaring omission in the public perception of this DEIS.

PRESENT USES

The present uses of Otero Mesa are marginalized in this DEIS. The importance of McGregor Range to hunters, particularly antique muzzle loaded gun hunters, and bow hunters is not mentioned. The antelope herds on McGregor are of "trophy" quality, and hunting is restricted to bow and antique gun hunters to preserve this unique herd. The proposed action will disturb this stable herd. (After personally being overflown on Otero Mesa recently, I can attest to the fact that antelope after a fear response go into a frenzy.) The reason to hike the uplands is to see the grazing deer herds. The numbers in these herds are weather dependent, numbers dropping naturally during periods of drought. Hunters regularly recreate on Otero Mesa grasslands and uplands to watch the condition and numbers in deer and antelope herds.

Wildlife on McGregor is owned and managed by the State of New Mexico for all the citizens of New Mexico; wildlife in Texas is owned by each individual property owner. Texans, including DOD personnel, get out of state hunting licenses and participate in the hunting seasons conducted under the auspices of the State Dept. of Game and Fish. Annual requests by Ft. Bliss to manage hunting on McGregor Range as though it were located in Texas, have annually been denied. The impacts of the proposed action on the wildlife and hunting seasons in New Mexico should be analyzed.

McGregor Range's Otero Mesa grasslands and uplands are used by civilian and uniformed personnel of the DOD to get away from the stress and noise of their jobs. Church groups, environmental groups, family units, all recreate on Otero Mesa, and use it as a place of quiet and solitude. Recent and planned low level overflights will have major impacts on these present uses.

Closures of SR 506 will have major impacts on recreation and residential use of the Lincoln National Forest and the people who live within it.

NOISE

The analysis of noise is flawed. It relies on startle reflex and helicopter studies, when because the proposed actions involve tornado jets, fear responses are what actually occur.

There is no analysis of tornado overflights on humans, their breeding livestock, show animals, and wildlife as a result of fear responses, and there should be. (It would seem logical that studies would be available from where these tornado aircraft are coming.)

Sonic boom analysis assumes people don't spend all day out of doors. The residents of southern New Mexico use evaporative coolers during the long summer months. These cooling systems require that windows be left cracked open all day and all night, which for the purposes of analysis, is living out of doors all day and night.

LASERS

The Areas of Critical Environmental Concern (ACECs) on the Otero Mesa rim are fenced, and have small signs which indicate persons should not go beyond the fence for reasons of harm to eye sight. This is because of laser testing from the Ft. Bliss Oro Grande test site that occurs both during the day and at night. From the diagrams presented in this DEIS, one corner of the West Otero Mesa NTC site appears to abut an ACEC.

Laser testing is also done at WSMR as part of continuing "star wars" research. Laser Demonstrations are done over the northern extension of WSMR by the Kirtland AFB, Phillips Lab, Airborne Laser Defense System, whose NEPA announcement was on the same Federal Register page as this DEIS. Roving Sands NEPA documents indicate it was it to demonstrated at least once this year.

Therefore, impacts from laser testing should be included in this DEIS.

THREATENED, ENDANGERED, AND SENSITIVE SPECIES

There appears to be an erroneous assumption made that the endangered aplomado falcon is dependent on grasslands. This is not true. The aplomado falcon is dependent on tall yuccas for nesting, tall enough to be away from predators. The impact of removing the yucca from the proposed West Otero Mesa site, must be analyzed, as the proposed action will have impacts on the nesting habitat of this bird.

HAPP has an endangered pup fish. Plans to protect this fish include limiting traffic and disturbances in the area where it lives. Protective mitigations must be included in this DEIS, and they are not.

The State listed Sensitive gramma grass cactus exists on the West Otero Mesa proposed site. Because Ft. Bliss personnel placed a

W-104 large pile of gravel on the site where this plant was first discovered, special care should be taken with this plant, and mitigations put in place.

W-105 The DEIS should change the listing "Mountain Lion" to "Cougar." The wildlife corridors used by cougars should be at least referenced. NM State Game and Fish Dept. sponsored cougar studies, widely presented in public meetings in New Mexico this year, indicate that these animals use wild life corridors through the McGregor area.

REASONABLE ALTERNATIVE SITES

W-107 All reasonable options have not been considered. There is room within the Existing Range option for the construction of NTC on WSMR. Retired WSMR employees have indicated that abandoned sites on WSMR could be used for a NTC. These are not analyzed and should be.

During the Theater Missile Defense Extended Test Range NEPA process, which includes the THAAD program, meetings were conducted by US Senator Bingaman, NM. It was clearly stated by program leaders that all Alternatives listed in their documents could and would be used for their programs. These include Eglin AFB, Western Range off California coast, and Kwajalein.

FIRES

W-108 The DEIS does not include an analysis of the normal, naturally occurring, unusually high number of lightning strikes on Otero Mesa. (I personally have counted up to 20 per minute during to verify this fact.) These strikes do cause fires. Most of these fires are small and self extinguishing, but not all or always. The DEIS does not include an analysis of the impacts to the NTC from fires ignited outside the target areas, and how fires will be fought. Fire breaks to control fire generated from within the target area may not be adequate to stop fires ignited by lightning from outside the target area, and associated damage. There is no water, or water pressure, or fire fighting equipment on NTC options to fight range fires.

COST ANALYSIS

W-109 This DEIS does not include an adequate cost analysis. Private property acquisition under any of the options will be necessary for reasons of low level flight noise. Damage costs associated with supersonic overflights must be analyzed. The effects of potential "boom-and-bust" effects on the City of Alamogordo and Otero County must be included. Payments to other federal agencies for damages to existing pipelines and facilities must be included.

REVEGETATION AND NOXIOUS WEED

W-110 The spread of non-native plants and shrubs is a major concern for ranchers and environmentalists. Under BLM, Forest Service, and I

W-110 believe HAFB, management the federal Noxious Weed program is used to stop exotic (non-native) plants invasions. Ft. Bliss does not, and I do not know if WSMR does or not. The removal of vegetation for construction and during NCT operations would create the ideal habitat for non-native plants, i.e. noxious weeds. Mitigations are not included in this DEIS.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-29-97

Thank you for your input.

PLEASE PRINT

I would like to as a U.S. taxpayer and concerned local citizen of Alamogordo, N.M. of course. I express my strong support for the planned expansion of German Air Force training operations at Holloman AFB (CAF II), including the additional 30 B-1B aircraft, the development of a dedicated bombing range to support German AF training and current and future USAF missions at Holloman AFB and the continued withdrawal of McGregor Range lands.

This is not just for the benefit of the German Air Force but also for a more balanced, strategic national defense policy for the United States. There are some people still fighting the World War of yesterday, but we must as with every other industry, move forward for smart team defense policies in this new global concern.

In a more local concern, the economic impact that will have on the County of New Mexico is significant and it always a welcome addition. The evidence to me indicates the addition of the CAF II is a much more positive impact than the existing status of the lands and its use. As always, with change comes disaffection and complaints but we must take the right decision for concerned. Once again, I fully support the CAF II mission station.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Margaret Selford

ADDRESS: P.O. Box 898

CITY: Alamogordo

STATE/ZIP CODE: New Mexico 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 07/29/97

Thank you for your input.

PLEASE PRINT

We Support this.
However, we would appreciate a little more courtesy from the German people to the local residents when shopping in the stores in Alamogordo.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: _____

ADDRESS: _____

CITY: _____

STATE/ZIP CODE: _____

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HQ ACC/CEVA

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LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-29-97

Thank you for your input.
PLEASE PRINT

In response to the proposed Air-Force Bombing and Practice Range, I am very much in favor of this proposal and endorse the Government's decision to provide Otero County/Alamogordo with such a tremendous opportunity for economic development.

As a business owner and resident of Otero County, I feel privileged that the German Air Force has selected Holloman Air Force Base and the surrounding area to pursue their training objectives. The new bombing range will boost our economy and is just what Southern New Mexico needs.

The proposed range site was well selected, and because of this impact on the natural environment will be very minimal. A rather small price to pay in exchange for the amount of economic and business growth that will come to Otero County/Alamogordo as a direct result of the proposed range.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Jim Turner
ADDRESS: PO Box 1827
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-29-97

Thank you for your input.
PLEASE PRINT

I SUPPORT HOLLAMAN'S
THEIR OWN BEING RANGE ON OTERO MESA.
THIS IS LAND THAT HAS ALREADY BEEN
PURCHASED FOR MILITARY PURPOSES AND IS
BEING USED BY THE MILITARY. THIS WILL BE
A GREAT ASSETTE FOR HOLLAMAN AND WILL
INSURE ITS FUTURE. THE ENVIRONMENTAL
IMPACT WILL BE LESS ON THE MESA THAN ON
THE DELICATE VEGETATION OF THE DESERT FLOOR.
THE MESA VEGETATION RECOVERS QUICKLY BECAUSE
OF MORE RAIN, THE DESERT FLOOR DOES NOT.
THE BLM IS EMPIRE BUILDING WITH THEIR
HOBBING EFFORTS.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: OLIF McDONALD
ADDRESS: 69 McDONALD ROAD
CITY: ALAMOGORDO N.M.
STATE/ZIP CODE: N.M. 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 29 JUL 97

YES I SUPPORT THE GERMAN AIR FORCE. THEY HAVE BROUGHT
A LOT OF REVENUE INTO THE COMMUNITY AND WITH AN ARMED EX-
PANSION TO THE BASE IT WOULD BRING MORE JOBS TO ALAMOGORDO.
I SAY GO FOR IT!!!

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: AVIS RENT-A-CAR
ADDRESS: 1401 S. WHITE STAINS BLVD. STE 1
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/29/97

I SUPPORT THE PRESENCE OF
GERMAN PERSONNEL AND
THEIR TRAINING PROGRAM
HOWEVER I FEEL THAT
BETWEEN WHITE SANDS,
FT. BLISS AND HOLLAMAN AFB,
THERE IS SUBSTANTIAL ACRES
OVER WHICH THE TORNADO'S
CAN PRACTICE THEIR BOMBING
RUNS.
LET'S GET THE BRANCHES
OF THE US MILITARY WORKING
TOGETHER ON THIS.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JO CARNE
ADDRESS: 2609 EASTRIDGE DR
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: July 29, 1997

Thank you for your input.

PLEASE PRINT

The United States Air Force needs their own bombing range. I support the Air Force in seeking a location in Otero County, New Mexico. If the Air Force cannot have their first choice on top of Otero Mesa, I certainly hope that we can have the second choice just off of the Mesa. The additional thirty German Tornado Aircraft and six hundred forty personnel will add to our economic base.

I wholeheartedly support the Air Force's proposal.

29 July 1997

Alamogordo Noon Lions Club
P.O. Box 361
Alamogordo, New Mexico
88310

Air Combat Environmental Analysis Branch
HQ ACC/CEVA
ATTN: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

Please be advised that the Alamogordo Noon Lions Club is in full support of the Holloman AFB Dedicated Bombing Range. The support was affirmed by an unanimous vote of the quorum of members present at the regular meeting held on 29 July 1997. We do not believe that there would be an adverse environmental impact. Further, we believe that the economic benefit to the community would be immeasurable.

If you are in need of additional information or comments you may contact me at your convenience.

Sincerely,
John F. Melton
John F. Melton
Secretary

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Randy Smith - Randy Smith
ADDRESS: 109 New York Ave. PO Box 638
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: July 29, 1997

I am in support of the United States Air Force having their own bombing range. It will add to the economic base of Otero County and will provide more jobs. Otero County and Alamogordo, New Mexico are dependent upon the Air Force. The bombing range on Otero Mesa would benefit both the Air Force and the people of Otero County.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Nell J. Henderson
ADDRESS: 1109 New York Ave. PO Box 638
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [x]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-30-97

WE SUPPORT ALAMOGORDO AND THE CHANGE 100%
ON THIS PROJECT IT IS FOR THE GOOD OF
OUR COMMUNITY.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: _____
ADDRESS: ALAMO MECHANICAL, L.L.C.
CITY: P.O. Box 1704
STATE/ZIP CODE: Alamogordo, NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Elizabeth McPhaul
P. O. Box 719
Socorro, New Mexico 87801

July 30, 1997

Dear Mr. Parker,

We are very definitely
opposed to the proposed low-
level flight training program
by the German air force.

We live in Socorro county
and raise good quality Quarter
horses. We do not want any
of our horses frightened by
low flying aircraft causing
them to run through fences
etc.

Your attention to this po-
tential problem is appreciated

We hope that the decision
will be favorable toward
the many livestock owners
and wildlife in this area.

Sincerely,

James & Elizabeth M. Phaul

BELL'S WESTERN REALTY
P.O. BOX 310, 1107 10th St.
ALAMOGORDO, NM 88310
Phone (505) 434-0411



DEPARTMENT OF AGRICULTURE
STATE OF NEW MEXICO

Box 30005, Dept. 3189
 Las Cruces, New Mexico 88003-8005
 Telephone: (505) 646-3007

Gary Johnson
 Governor

Frank A. DuBelle
 Secretary

July 30, 1997

Air Combat Environmental Analysis Branch
 HQ ACC/CEVA
 Attn: Ms. Sheryl Parker
 Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

I have owned a Real Estate Business in Alamogordo for many, many years and have seen the market go up and down over the years.

The first phase of the German Air Force has been a major economic impact in Otero County in both construction and houses and apartments. Property values have increased and the overall economic impact has been significant.

I very much support Holloman's position on the McGregor Bombing Range. I support the planned expansion of German Air Force training operations at Holloman AFB (GAFII).

Sincerely,

Marion Bell

August 4, 1997

U.S. Air Force Headquarters
 Headquarters Air Combat Command/CEVA
 129 Andrews Street
 Langley AFB, Virginia 23665-2769

To Whom It May Concern:

These comments address the *Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico - Draft Environmental Impact Statement (DEIS)*. The New Mexico Department of Agriculture (NMDA) is opposed to the construction of a new target complex (NTC) on western Otero mesa or in the Tularosa Basin of McGregor Range. Not only will there be a loss of valuable forage on McGregor Range, but livestock operations on nearby private lands will also be affected.

Due to the high quality forage and extensive range improvements, the opportunity to graze livestock on the McGregor Range is a highly sought after commodity. This is evidenced in the high dollar amounts being received per Animal Unit Month (AUM). The DEIS states the construction of a NTC on the western Otero mesa will result in a very minor reduction in actual grazeable acreage on the McGregor Range. Unfortunately, grazing restrictions implemented by the various federal land management agencies are becoming increasingly common. Thus, any loss in grazeable acreage, particularly high quality forage as is found on the McGregor Range, is significant to New Mexico's livestock industry. Therefore, what mitigation measures are the military providing for this loss of AUMs? Will the same quality and quantity of AUMs be provided elsewhere?

Livestock operations will also be affected well beyond the proposed 5,120 acre impact area(s). The DEIS states the Onset Rate Adjusted Day-Night Average Sound Level will be in excess of 80 dB, not only above the proposed NTCs but also at reference points located off the McGregor Range. The DEIS states noise levels up to 81 dB, "...would be incompatible with isolated residences." Does this mean ranchers residing in those areas are expected to relocate? What impacts will the increased noise levels have on livestock performance in areas surrounding the proposed NTCs? How does the military intend to mitigate for these impacts? What about damages and human safety risks resulting from frightened animals? NMDA believes the DEIS is inadequate in its evaluation of these impacts.

NMDA also has some concerns related to the National Environmental Policy Act (42 U.S.C. § 4371 et seq.) process. The Council on Environmental Quality's (CEQ)-NEPA regulations direct the lead agency to invite the participation of affected federal, state and local agencies during the scoping process (40 CFR § 1501.7(a)(1)). Several counties are included in the DEIS distribution list except Otter County, New Mexico, which is where the primary impacts will occur. Was Otter County contacted early in the scoping process as required by NEPA? The Code of Federal Regulations also state, "Environmental Impact Statements shall be written in plain language and may use appropriate graphics so that decisionmakers and the public can readily understand them (40 CFR § 1502.8). The DEIS is a very lengthy and complex proposal, and NMDA believes it is not written in the most easily understandable text. Therefore, the public's ability to assimilate this information and provide meaningful comments may be hindered. This is particularly relevant considering the comment period is limited to only 30 days.

Further, the CEQ-NEPA regulations require detailed analyses of economic and social impacts (40 CFR § 1508.8(b)). This includes both direct and indirect effects and their significance (40 CFR § 1502.16). This action must also be evaluated cumulatively with impacts of past and reasonably foreseeable future actions (40 CFR § 1508.7). The DEIS is lacking in its evaluation of these effects on rural livestock producers and their local communities.

Thank you for your time and consideration of this department's comments.

Sincerely,

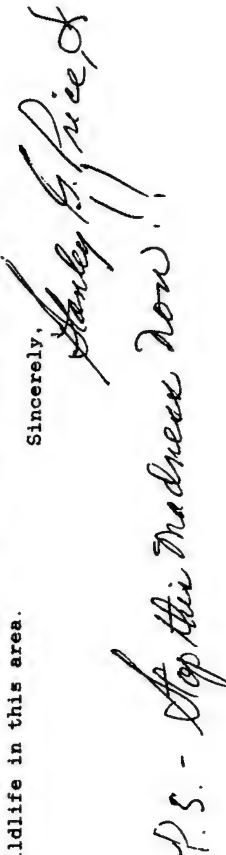

Frank A. DuBois

FAD:rjw:wjm

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,


P.S. - Stop this madness now!!

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Phyllis M. Rice

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely, David Wehly

David Wehly

(include address)

HC 64 Box 11
Maydlena N.M.

87825

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Anne Welty
PO Box 88
Winadun, N.M. 87943

(include address)

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely, *Anne Welty*

Anne Welty

(include address)

4664 Box 1
Magdalena, N.M. 8782

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

David J. Jones

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Wilma Hayes

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: _____

DEAR SIR:

THANK YOU FOR BEING IN OUR AREA

THANK YOU FOR KEEPING THE PEACE

THANK YOU FOR WANTING TO BE PREPARED

THANK YOU FOR ALL OF THE TRAINING THAT YOU

YOUR PEOPLE DO TO BE COMBAT READY.

THANK YOU FOR SHOWING OUR FLAG IN ALL PARTS OF THE WORLD

THANK YOU FOR MAKING ALL OF THE LONG FLIGHTS TO OTHER PARTS

OF THE WORLD FOR ALL OF THE LONG HOURS THAT YOU GIVE.

YOU HAVE BEEN A TREMENDOUS ASSET TO OUR AREA FOR MANY YEARS.

IT IS TOO BAD THAT YOU HAVE TO DEVELOP A ENVIRONMENTAL

IMPACT ANALYSIS TO THE EXTENT THAT YOU DO. WHAT WOULD WE DO

IF A FIGHTING WAR CAME ALONG.

YES, I AM FAVORABLE TO AND WANT YOU TO HAVE YOUR OWN RANGE

AND ON TOP OF THE MESA SUITS ME FINE.

I HAVE LONG BEEN ACTIVE IN THE COMMUNITY SERVING AS

PRESIDENT OF THE SCHOOL BOARD, ROTARY, BOY SCOUTS, CHAMBER

OF COMMERCE, CITIZEN OF THE YEAR 1979, A LONG TIME MEMBER

OF THE FIRST NATIONAL BANK BOARD.

I AM PROUD OF OUR CONTINUED COMMUNITY BASE RELATIONS.

GOOD LUCK,

KENNETH G. GARLAND

1801 JUNIPER DRIVE CONVENT 98 BACK FOR MORE SPACE

ALAMOGORDO, NEW MEXICO 88310

ADDRESS: 1801 JUNIPER DRIVE PO BOX 426

CITY: ALAMOGORDO, NM. 88310

STATE/ZIP CODE: _____

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

Ms. Sheryl K. Parker
HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, VA 23665-2769

Please be advised,

This land is our land, and freedom is just a word until you lose it.

We who live in the vicinity of Holloman Air Force Base should have the sole right to object to the Proposed Expansion of German Air Force operations. Our environment will be in danger of hazardous flight operations. The noise will invade our peaceful and quite liveliness. Our privacy will be eliminated. The fresh air we breathe, polluted. I cherish our simple mountain pleasures and want future generations to be able to enjoy them.

Why can't the Germans perform the operations in their own country?

This home was bought and paid for by my hard labor and many sacrifices.

Who will benefit from this situation?

A concerned home owner in the Sacramento Mountains of Cloudercroft, New Mexico.

Mrs Julia Doscher

Mrs. Julia Doscher



Julia Doscher
P.O. Box 32
Cloudercroft, NM 88317

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-12-1997

Thank you for your input.

PLEASE PRINT DEAR UNITED STATES AIRFORCE PEOPLE:

We are ranch and farm land owners within the Airforce Training Routes 102 and 141. We live on the land and it is our only livelihood.

Your proposed expansion and use of training routes and new construction and the 1500 additional people coming into Holloman will be a great benefit to the people of Alamogordo and surrounding area.

No doubt the training of new pilots and airforce people and all the associated activities will benefit the United States. However, we feel like everyone should share in the expense of this new, proposed activity that will be a benefit to all of us.

In the public meeting at Dell City, Texas one of your officers said that our area is the very best air space in the entire world for this training. Apparently the terrain features of the proposed routes accommodate the aircraft radar training requirements very well.

One of your main reasons for entering into an agreement with the German Government is the availability of a wide variety of terrain close to the base. A lot of this "wide variety of terrain" is private land and you should not assume that you are free to use it at the expense of the landowner.

OVER PLEASE

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: James Lynch
ADDRESS: P O Box 182
CITY: Dell City, Texas
STATE/ZIP CODE: Texas 79837

Please check if you would like to receive a copy of the Final Environmental Impact Statement. | |

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA

ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-1769

We will no longer have peaceful possession and use of our land.

Your actions will cause great hardship to those of us on the ground.

Many of us place high value on the quietness of the rural land.

The activity will cause loss and injury to people and livestock.

The noise will be unbearable and damaging.

Property values in those affected areas will suffer.

The estimated cost of construction and related activities apparently will exceed \$100 million dollars. In that budget you will pay Architects, engineers, military experts, contractors, construction workers, carpenters, plumbers, electricians, machine operators but nothing to the landowner whose land-air space you propose to use.

Everyone should be responsible and pay their own way.

Oil and gas explorers pay rental on land used.

Prospectors and miners pay their way.

Movie people, TV commercials, Artists and Professional Photographers all pay for the use of the land and viewed.

Please consider a fair compensation for the use of our country. It is the fair and just thing to do.

Sincerely,


James Lynch

Forb. M. M.
7/14/97

Dear Sirs;
Concerning the German Air Force
operations - I am against any expansion
we don't need any more foreign bases here
and we certainly don't need to give them
more space. How long before they demand
more and more of our country not just
requesting why are we giving our
voluntary army to NATO and allowing to
foreign businesses as parasites can
be served instead of giving more just
servo day them. Now we god can see
I am disgusted with our government.
I fear for my family and children and
grandchildren especially. Thank you
for letting me hear your ear.

Pauline Doe
207 W. 6th St
Forb. M. M. 89901

83 years old

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: July 15, 1997

Thank you for your input.

PLEASE PRINT

I heartily endorse the planned expansion of German
Air Force Training operations at Holloman AFB because
I feel it is in the best interest of Otero County,
New Mexico and the USA to do so.

This joint project of the USAF and the German
Air Force has an immense financial and social
impact on our area and continues to ensure
closer ties between our two countries as well
as demonstrating the close association between
town and base.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: MRS. HELEN A. RACEOSIN
ADDRESS: 2518 Tulane
CITY: ALAMOGORDO
STATE/ZIP CODE: N.M. 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 18 July 97

To Whom It May Concern:

I strongly support the expansion of Holloman Air Force Base's range facilities. The life blood of Otero County is generated from a healthy HAFB. Holloman's continued existence depends on its ability to respond to changing missions. Holloman's ability to control its own dedicated range on Otero Mesa greatly enhances its worth to the Department of Defense and thereby helps to ensure its continued benefit to the nations defense and Otero County's economy. I also strongly support the planned expansion of German Air Force, training operations at Holloman Air Force Base, including an additional 30 Tornado aircraft (GAF II). The huge economic benefits of the expansion of a dedicated range and the increased German training efforts not withstanding our ability to support GAF II demonstrates our commitment to HAFB, our willingness to support future missions, and our resolve to follow through on our PROMISE to support German Air Force training. JET noise is the sound of FREEDOM!

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: G. Dwight Harp, SBDC Director
ADDRESS: 2230 Lawrence Boulevard
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-18-97

I support the attempts of Holloman AFB to establish a dedicated range for low-level training. The establishment of such a range is critical to the economic health of the area. Failure to establish such a range would jeopardize the continued existence of our base. I support planned expansion of the German training operation. Please do not

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: EURTSETH WILKINS
ADDRESS: 205 TEAKWOOD
CITY: ALBUQUERQUE
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

allow the forward movement
to be taken by those whose interests
are not for the welfare of this
community as a whole. Pay
absolutely no attention to the G.M.

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/19/97

WE HAVE FELT FOR SOME TIME THAT THE UNITED STATES
HAS COMPROMISED ITS POSITION FAR TOO MUCH BY DOWN-
SIZING OUR MILITARY FORCES.

WE ARE, THEREFORE, IN TOTAL SUPPORT OF THE BOMBING
RANGE EXTENSION TO ALLOW THE EXISTENCE OF HOLLAMAN
AIR FORCE BASE AND TO ALLOW OUR GERMAN FRIENDS TO
CONTINUE (OR TO INCREASE) THEIR MISSIONS ALONG WITH
OUR AIR FORCE SO THAT THEY MAY REMAIN PREPARED
TO DEFEND OUR COUNTRY WHEN THE NEED ARISES.

OUR SUPPORT DOES NOT TAKE INTO CONSIDERATION
THE MONETARY IMPACT OF HOLLAMAN AIR FORCE BASE
AND OUR GERMAN AIR FORCE ON OUR COMMUNITY.
BUT THAT IS AN ADDED PLUS FOR OUR SUPPORT

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME:

Jagger and Eddie Olsen

ADDRESS:

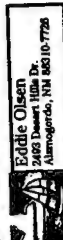
2493 DESERT HILLS DRIVE

CITY:

ALAMOGORDO

STATE/ZIP CODE:

N.M. 88310



Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

July 19, 1997

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, Va. 23665-2769

RE: Proposed Expansion of German
Air Force Operations at Holloman
Air Force Base

Dear Ms. Parker:

I am writing in response to the Draft Environmental Impact Statement (EIS) that has been prepared in regards to the above mentioned proposal. I attended the meeting in Alamogordo, N.M. and spoke about many of my concerns, but feel that this is such a dramatic proposal that I also want to submit my comments to you in writing. I would like to preface my comments by stating that I absolutely support Otero County, the City of Alamogordo, and Holloman Air Force Base, but NOT AT ALL COSIS!! I was born in Alamogordo, all 3 of my children and my granddaughter were born there, and I still have very close ties to the town. I want Alamogordo to prosper, and without doubt Holloman has been an important part of the growth of this entire area.

I currently live on a family cattle ranch located on Otero Mesa on the east side of McGregor Range and, therefore, will be directly affected by any decision that will be made concerning this proposal. My first comment is to address the subject of safety. Due to the location of my home being directly affected by the sorties of the Tornado aircraft I am very concerned about the safety of myself, my family, our livestock from which we derive our livelihood, the area wildlife, and the rangeland. Do these German aircraft meet the safety standards established for American aircraft? What type of training have the ground crews for these planes completed? What about the safety standard concerning their "bomb drops" since I will literally be in the locality of their training. It could be disastrous for us if they just got a little off course and let one accidentally be dropped.

What about legal and civil actions that might become necessary. Could civil or criminal charges be filed against the German troops or citizens to hold them responsible for their actions or will they be given political immunity? For example, if one of the German pilots has too much beer, flies one of the planes, and causes property damage or bodily harm (as in DWI) can charges be brought in the Courts and the individual prosecuted?

There is gross misinformation presented concerning the proposed bombing areas. It is stated that if the Tularosa Basin option is selected as the training area that it would cost the American taxpayer \$20 million. If this amount was correct, \$12 million would be paid by the Germans and it would cost the Americans only \$8 million. The amount is incorrect, however, because the funds for this cleanup have already been appropriated by Congress and part of the cleanup process has already begun. So-----if this area is chosen it should not cost the American taxpayer any additional funds to prepare this location.

Since ranchers are the original environmentalist, I have a deep concern for the Otero Mesa. If the target complex is constructed on the Mesa a beautiful grassland and the aesthetic value it has will never be the same. This area should not be sacrificed for training military troops, especially from a foreign country, when other very viable options are available, using already existing areas.

From my lifelong knowledge of livestock, I can assure you that our livelihood of ranching will be destroyed by the proposed low flying aircraft. The cattle will not reproduce under such stressful conditions and there will be many instances where physical harm will come when they run through fences or get themselves into other critical situations due to fright. A person that is riding a horse when one of these planes flies over literally has their life at stake. What damage will be caused when one of the low flying aircraft passes over a windmill or other structures located on the ranch? In addition to physical harm, the value of our ranch will collapse. Who would want to own a ranch with all these planes flying over so low and making so much noise????? This ranch, as most of the ones in this entire area, contain deeded, State, and Federal land. What would this proposal do to the value of all these properties? Has this been addressed? I don't think that it has.

I do not believe this draft EIS was done under the NEPA guidelines. The Otero County Commissioners were not involved as required. There is not a single Otero County Commissioner or an Otero County Commissioners Office listing on the Holloman II EIS mailing list that is included in the Draft EIS. This proposal absolutely affects a substantial portion of Otero County for numerous reasons.

In your list of Endangered and Threatened Species and Critical Habitats that were studied I feel there is one, and the most important of all, omission. That is the heritage, homes, families, lifestyles, and businesses of the rural American families that live in the areas included in your proposal. These are the families that have contributed beyond compare to the

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-21-97

Thank you for your input.

PLEASE PRINT

I am in total opposition to any new Target areas for Holloman AFB.

Reasons: Use of Otero Mesa would mean no other use of the area: no hunting, grazing, recreation. It would also mean restrictions on land surrounding the mesa including any private lands within the "buffer" zone and for some distance beyond as well as access to these lands.

If No need to litter the mesa with ordnance of any kind since the Tularosa Basin Complex is already littered and should be cleaned up anyway.

The use of the phrase "minimal impact" for every proposed action is questionable - who knows what impact is minimal? How was this established?

Water is another big potential problem to Alamogordo and Holloman is growth of the population is not addressed more thoroughly.

For years we have tolerated jets from Holloman flying low (and loud) over us - humans and animals don't like it but it was patriotic not to complain. My patriotism does not extend to other nations using my air space!

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Alvarce Stewart According to the Air Force map I saw there is
ADDRESS: 1799 NM Hwy 24 no Weed, Pinon, Mayh.
CITY: Weed Sacramento or Hope.
STATE/ZIP CODE: N.M. 88354 New Mexico.

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

w-126 development of this entire area for generations and they must be protected as the good, hardworking American citizens they have been for decades.

In view of all of these unanswered questions, very real concerns, misinformation, improper preparation of the Draft EIS, and disastrous results that will come to pass with the acceptance of this proposal (especially if the Otero Mesa bombing area is accepted) I recommend that the NO-Action alternative be selected.

Thank you for your attention to this matter.

Sincerely,

Martha Coody

Martha Coody
P.O. Box 247
Alamogordo, New Mexico 88311-0247
Telephone: (505) 963-2383
Fax: (505) 963-2459



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

2

proposed action. These resources included: air space management, air quality, archaeological, cultural and historical resources, water resources, hazardous waste and waste management, safety, utilities, transportation, and soils. However, the comparison indicates significant cumulative impacts would be expected for noise, land use, and socioeconomic resources.

July 21, 1997

Sheryl K. Parker
HQ Air Combat Command
EIS Project Officer
129 Andrews Street
Suite 102
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality Regulations for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) for the proposed establishment of the Garman Air Force (GAF) Replacement Training Unit at Holloman Air Force Base (AFB), New Mexico.

The three alternatives being considered to meet the air-to-ground training requirements include: establishing a new tactical target complex on the west edge of Otero Mesa within the McGregor Range in southern New Mexico, establishing a new technical target complex within the Tularosa Basin Portion of McGregor Range, or using only existing target ranges. Aircraft would access either of the proposed ranges or existing ranges using existing military training routes.

Under the proposed action the Air Force proposes to bed down 30 GAF Tornado aircraft and associated operations and support personnel at Holloman AFB, New Mexico. Under this action, a replacement training unit for GAF PA-200 Tornado aircrafts would be established at Holloman AFB. GAF personnel permanently assigned to Holloman AFB would include instructors, technicians, administrative personnel, and other support functions.

The EIS addresses cumulative impacts of the proposed action in concert with other actions which have been recently implemented, or will be implemented in the reasonably foreseeable future. A comparison was made of conditions that prevailed for fiscal year (FY)95 with those that would prevail for FY2000 baseline, and under the proposed action. This comparison indicated that for most resources no significant cumulative impacts would be expected following implementation of the

The following comments are offered for your consideration in preparation of the Final EIS.

Environmental Justice

All Federal agencies should be aware that on February 11, 1994, Executive Order 12898 (E.O.) on "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," and an accompanying Presidential Memorandum was issued. The E.O. directs Federal agencies to analyze "the environmental effects, including human health, economic and social effects, of federal actions..." The Presidential Memorandum directs EPA to ensure that Federal agencies analyze the environmental effects of Federal actions on minority and low-income communities when such analysis is required by the National Environmental Policy Act of 1969 (NEPA, 42 U.S.C. Section 4321 et seq.)

Although social and economic impacts have always been a consideration in EPA's Section 309 reviews, the Presidential Memorandum highlights the necessity to better integrate the consideration of human health, social and economic effects into the Section 309 review process. The E.O. calls for collection and analysis of information on race, national origin, income level and other appropriate information for areas surrounding projects that have expected environmental, health and economic effect on those populations. Environmental Justice must be addressed in the Final EIS.

Mitigation

Section 1502.14(f) of the CEQ regulations state that an EIS must address for each alternative appropriate mitigation measures not included in the proposed action or alternatives. Section 1508.20 defines mitigation to include: a) avoiding the impact altogether by not taking a certain action or parts of an action; b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; c) rectifying the impact by repairing, rehabilitating or restoring the affected environment; d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and e) compensating for the impact by replacing or providing substitute resources or environment. A mitigation section should be included in the Final EIS for those actions having significant cumulative and direct impact to the environment.

The EPA rates your DEIS as "EC-2" i.e., EPA has "Environmental Concerns and Requests Additional Information". Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act, to inform the public of our views on proposed Federal actions.

We appreciate the opportunity to review the DEIS. We request that you send our office five (5) copies of the Final EIS at the same time that it is sent to the Office of Federal Activities, (2251A), EPA, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460.

Sincerely yours,

Michael P. Jansky
Michael P. Jansky, P.E.
Regional Environmental Review
Coordinator

SUMMARY PARAGRAPH FORM

ERP NUMBER

D-UFA-G11033-NM

RATING ASSIGNED TO PROJECT

EC-2

NAME OF EPA OFFICIAL RESPONSIBLE

Michael Jansky
309 Coordinator

SUMMARY OF COMMENT LETTER

EPA has environmental concerns and requests additional information be provided in the Final EIS in the areas of environmental justice and in the area of mitigation of significant cumulative impacts i.e., noise, land use, and socioeconomic.

PARAGRAPH APPROVED FOR PUBLICATION

(Initials of
Approving Official)

July 21, 1997

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, Va. 23665-2769

Re: Proposed Expansion of German Air Force operations At Holland Air Force Base

Dear Ms. Parker:

Thank you for the opportunity to comment on the above noted issue. For the record, I am adamantly against the German operations at Holland Air Force Base and am most certainly against any increased activity.

In general, I believe the Germans would be training in and over their own country if the environmentalist in that country had not curtailed their activities because of environmental concerns: air quality and noise pollution, just to name two. So, now they are over here polluting our environment.

I find it unconscionable that our government would allow *any* foreign country to train militarily in and over our country, no matter how much money they are paying U.S.

As for comments on the draft Environmental Impact Statement: Two plans have been mentioned: fighters flying at an elevation of 100 feet every 40 minutes around the clock and fighters flying at 500 feet six to eight times a day. Either plan would be very disruptive if you happened to be unfortunate enough to be any where near the flight path.

Increased flights of German air craft will affect virtually every aspect of the daily lives of those in the affected areas, from the health, welfare and personal safety of families to the economic value of livestock, property, and the wildlife.

I have seen first hand how low flying planes can scatter livestock, separating mothers from their suckling young, how they are driven into fences trying to get away, only to break their neck.

The breeding of both domestic and wild animals will be disrupted causing a negative impact on the reproductive capacity of those animals who are within the flight path of those German bombers. How will the loss of productivity be compensated for and who will pay for that compensation. What will be the economic impact of the loss of productivity on rural communities who will suffer if stockmen produce less livestock and wildlife reductions create loss of hunters?

What about stress and the loss of human productivity caused by continuous low flying German military planes?

Page 2
Ronald L. Merritt

Perhaps, Ms. Parker, you and those who make these decisions should allow the German planes to fly over *your* offices at 100 feet every 40 minutes around the clock while you try to work, then they could fly over *your* home while you are trying to rest or enjoy some time in *your* yard. Perhaps then the ones that do live in their flight paths wouldn't have to comment on the environmental impact of German operations because *you* would know first hand.

Sincerely,



Ronald L. Merritt
HC66 Box 30
Yesso, New Mexico 88136

Expansion of German Air Force Aircraft Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

EXPANSION OF GERMAN AIR FORCE AIRCRAFT OPERATIONS AT
HOLLOMAN AIR FORCE BASE, NEW MEXICO

Thank you for your input.
PLEASE PRINT

DATE: July 21, 1997

The listening to discussions regarding the expansion of the white sands bombing range to accommodate training for the German Air Force. I am on the side and as well as the bombing range, it is my opinion that the existing bombing range is adequate for training. I also feel that to expand the range to include any more would be an undue waste of US resources. I believe in the US Armed Forces should also call for a reduction of our expansion of training facilities. As to the use of BLM land for bombing range expansion, the city of El Paso has a large portion of the eastern slope of the Franklin Mountains that are unusable due to their use as an impact area. A lot of clearing the slopes is prohibitive and never complete. With that experience, I am convinced that use of BLM land for bombing practice would remove it from public use. If any measure for all time and that is unacceptable. Banning BLM land, regardless of how small an area would cause unacceptable losses of wild life and threaten already survival species. To summarize, I feel that existing bombing facilities are adequate and the expansion of bombing ranges to include BLM land is unnecessary and unacceptable.

.... CONTINUE ON BACK FOR MORE SPACE

NAME: Vey R. Lofgren
ADDRESS: 1425 Dale Rd
CITY: El Paso, TX
STATE/ZIP CODE: EL PASO, 79915

Please check if you would like to receive a copy of the Draft Environmental Impact Statement. ()

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/21/97

MS. SHERYL PARKER,

This just a brief note to state that I support the expanded bombing range at Holloman AFB. The increased German participation in training and funding of this project.

I think the environmental concerns are minimal and that we should go forward with this program as quickly as possible. I will help us to stay strong defensively and would also help Alamo, and other country.

Emergency - I favor & support this planned expansion.

.... CONTINUE ON BACK FOR MORE SPACE

NAME: Kelly Noyen
ADDRESS: 1502 Rockwood
CITY: Alamo, CO
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ()

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 7/22/97

PLEASE PRINT

I support the effort to bring additional
German aircraft along with the personnel and construction
they would bring. Those opposed are a very small minority
of self interested individuals.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Jim Blackwell

ADDRESS: 2299 24th St. Apt. 1

CITY: Alamogordo NM 88310

STATE/ZIP CODE: N.M. 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 7/22/97

PLEASE PRINT

I Support the Range Expansion
and A Strong Defense. Holloman is very important
to all of us! Not just Alamogordo - but the
whole country! Please count on my support for
this issue. Thank you!

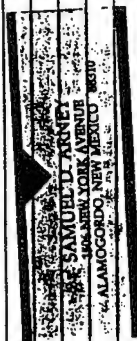
[Signature]

I.C.I. Enterprises, Inc.

DBA: Subway of Alamogordo

P O Box 154

Alamogordo NM 88311



**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Sam D Arney, I.C.I. Enterprises, Inc

ADDRESS: 1506 New York Ave

CITY: Alamogordo

STATE/ZIP CODE: New Mexico 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 1-22-97

I Support this bombing range at Holloman
and the growth of our Air Force.
The town of Alamogordo needs to have a
better economy.

Thank you for your concern.
Sharon Covarrubias

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Sharon Covarrubias
ADDRESS: P.O. Box 471
CITY: Alamogordo NM 88310
STATE/ZIP CODE: New Mexico 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 1-22-97

I Strongly support the expansion of
German AF training operations at Holloman
AFB, NM and the development of the
bombing range.
This is not only for the German AF, but
also to insure the future of Holloman AFB.
Holloman AFB, its staff and people and
the German AF training is wanted for
our area -
Support the development!!

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JOANNE WESTPHAL
ADDRESS: 2 Robin Lane
CITY: Lakewood, N.M.
STATE/ZIP CODE: 88337

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☐

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 22 Jan 97

I strongly support the expansion of the German
Air Force Operations at Holloman and development
of the bombing range.

There are always reasons not to do something
but in this case there are far many
more reasons to act. Let's get on with
building the range.

..... CONTINUE ON BACK FOR MORE SPACE

NAME: Robert M. Morrison
ADDRESS: 352 Birdie Ct
CITY: Alamogordo
STATE/ZIP CODE: NM 88510

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-22-97

I support this

..... CONTINUE ON BACK FOR MORE SPACE

NAME: Greg Costello
ADDRESS: 1120 10th St
CITY: _____
STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/22/97

I am very much supportive of the Air Force having their own bombing range at Holloman Air Force Base. I believe it would favorably impact Holloman and the Tusasa Basin as well.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-26-97

We absolutely support this.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Celma E. Pasos-Shuttle / Sarah Poole
ADDRESS: PO Box 108
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Beverly Coble - CEO BOM
ADDRESS: 1019 N Florida Sub# 6
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

THE PET PHARMACY®
DIVISION OF BLOCH AND KEMPER INC.
VETERINARY QUALITY AT PET OWNER PRICES

RODGER BLOCH
PRESIDENT

1517 E. TENTH STREET
ALAMOGORDO, NM 88310-5044

(800) 453-7444
(505) 453-7444
Fax (505) 437-2124
Home (505) 437-2145



Dr. Expansion
Chamber of Commerce
Ambassador

Rodger Bloch
THE PET PHARMACY
1301 N. White Sands
(505) 437-4120 Chamber of Commerce
(505) 434-6564 Business Alamogordo, NM 88310

WRITTEN COMMENT

Thank you for your input.

PLEASE PRINT

DATE: 7-22-97

PLEASE GIVE HOLLAMBY AIR FORCE
BASE YOUR COMPLETE SUPPORT INCLUDING
EXTENDING BOMB RANGING SO THEY CAN
COMPLETE THEIR MISSIONS. THE
SURROUNDING COMMUNITIES SUPPORT AND
DEPEND ON HOLLAMBY. THE PHOTOCOPY
HAS BEEN IN THE MAKING FOR 50 YEARS
AND CONTINUES TO GROW STRONG.

THE ENTIRE U.S.A. AND THE A.F.
FORCE HAVE GAINED MUCH KNOWLEDGE
FROM HOLLAMBY AND THE WHITE SANDS
PROVING GROUNDS. SO LET KEEP UP THE
GREAT WORK BEING DONE IN THE
GEOGRAPHICAL REGION. WHAT A BIG
IN - HOLLAMBY, WHITE SANDS, AND BLISS!

WE DO APPRECIATE YOUR SUPPORT IN
THIS AREA

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: **RODGER I. BLOCH**
ADDRESS: **1513 CRESCENT DRIVE**
CITY: **ALAMOGORDO, N.M. 88310**
STATE/ZIP CODE: _____

THE PET PHARMACY®

(800) 453-7444
1517 East 10th Street
Alamogordo, NM 88310-504

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/20/97

I fully support the positions of
the Alamogordo Chamber on this issue

[Signature]
7/20/97

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: **Arthur W. Austin MD**
ADDRESS: **1101 9th**
CITY: **Alamogordo**
STATE/ZIP CODE: **NM 88310**

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

THE GERMAN AIR FORCE HAS ADDED SO-O-O VERY
MUCH TO OUR COMMUNITY. I'VE LIVED IN ALAMOGORDO
FOR 10 yrs now and when the German Air Force came
A'VE EVEN MADE MORE FRIENDS NOW BEING THAT
THEIR CHILDREN HAVE GONE TO SCHOOL WITH MINE AT
BUENA VISTA ELEMENTARY SCHOOL. MY DAUGHTER
HAS MADE MANY FRIENDS ALSO.
WE NEED THE GERMAN AIR FORCE HERE..
THEY HAVE ADDED SO MUCH TO THE ECONOMY,
NEIGHBORHOODS, EDUCATION.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: PAMELA E HALL
ADDRESS: 918 10th St.
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

DATE: 22 July '97

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

I strongly support the proposed
expansion and the development
of the bombing range for two
purpose and future uses at
Holloman AFB. I have been
a resident of this community
for 30 years and see no
doubt impact of any significant
to the expansion, whereas the
long-term benefit to the
area and USAF are overwhelming.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: TOM QUINSTRUP
ADDRESS: 1011 New York Ave
CITY: Alamogordo, NM 88310
STATE/ZIP CODE: New Mexico 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

DATE: 7/27/97

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT
DATE: 7-22-97

Ms. Sheryl Parker
Langley, AFB VA

This letter is being sent in support of the expansion of the German Air Force training operations at Holloman AFB. Not only the German Air Force but also our own US Air Force would benefit from this expansion. Expanding the base is that the Germans would be funding the majority of the cost.

We must continue to have a strong defense which Holloman has always played an important role during back to WWII.

The planned expansion would also benefit our local community economically & help to create new jobs in our area.

Again let me say I am highly in favor of this project and support it 100% - I definitely don't feel there is any serious significant environmental concerns associated with this expansion.

NAME: Wade D. Dwyer
ADDRESS: 429 9th St
CITY: Alamogordo, NM
STATE/ZIP CODE: NM - 88310

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ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT
DATE: 7-22-97

I strongly support the planned expansion of the German Air Force training operations at Holloman AFB (CAF II), including the additional 30 Tornado aircraft, the development of a dedicated bombing range to support German AF training and current and future USAF missions at Holloman AFB, and the continued withdrawal of MacGregor Range lands.

The development of this bombing range will benefit not only Holloman AFB but also the training of the German AF pilots but will provide a long term addition to Holloman's capabilities and our nation's defense.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Ronald E. Burch
ADDRESS: P.O. Box 630
CITY: High Wells
STATE/ZIP CODE: NM 88325

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Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Fellinger, Bloom & Quinlan, P.C.

ATTORNEYS AT LAW
FIRST NATIONAL BANK BUILDING
POST OFFICE DRAWER M
ALAMOGORDO, NEW MEXICO
83111-1521

George E. Fellinger
Norman D. Bloom, Jr.
Gregory M. Quinlan
John D. Wheeler

Phone: 505-437-6620
FAX: 505-437-6629

July 22, 1997

Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA
ATT: Ms. Sheryl Parker
Langley Air Force Base, Virginia 23665-2769

Dear Ms. Parker:

The purpose of this letter is to support the planned expansion of the German Air Force training operations at Holloman Air Force Base (GAF II).

Any such expansion would have little, if any, negative impact on the environment or the lives of the people living in this area. This is an appropriate utilization of the territory.

Alamogordo and the surrounding communities in the Tularosa Basin, as well as the whole state of New Mexico, have long been supportive of military operations. I can think of no better place than Holloman Air Force Base for the expansion of the German Air Force training operations.

Very truly yours,

Gregory M. Quinlan
Gregory M. Quinlan

GMQ:ep



7/22/97

Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA
Atten: Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker,

We here at KZZX/KINN Radio, do support the planned expansion of German Air Force Training operations at Holloman, AFB. Development of a dedicated bombing range to support German AF training, along with current and future USAF missions at HAFB. The small part of BLM land required for this expansion is for the good of all Otero County.

Holloman Air Force Base is a vital part of the Otero county economic base, employing well over 1,000 civilians and pumping approximately \$400 million into local economy. When the German Air Force brought their training operations to Holloman, it impacted Otero County to the tune of 60 million construction dollars plus an annual economic contribution of nearly \$12 million.

The GAF II expansion is expected to add \$21 million annually to our local economy, not to mention over \$100 million in construction of target complex and local construction.

Although we understand the concerns of local ranchers on this issue, we also believe the Air Force will work with these people to the best of their ability and allow the ranchers to continue to use the area for grazing purposes.

Proposed changes to the water tanks and lines by the Air Force will actually prove to be an improvement over existing facilities.

We are committed to the support of Holloman AFB, GAF II & future missions. We intend to keep our promise to support German AF training if at all possible.

Verde J. Vaughan
Verde J. Vaughan
General Manager, KZZX/KINN RADIO
Alamogordo Chamber of Commerce, Committee of Fifty

P.O. Box 618 • KINN - AM • Alamogordo, NM 88311-0618 • KZZX - FM • Phone (505) 437-4440 • Fax (505) 434-2586

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 1-23-97

Having Attended the Meeting on 1-12-97 at DFL/EE And Tuleman in Alameda and a Open County Hearing by the County Commissioners on 1-21-97, I would like to make the following comments:

- As a property owner in Alameda & DFL County, I can see no reason for supporting the Tactical Test complex on the West Edge of DFL Mesa.
- Having been involved in the Training & Learning Community, most of the noise and activity from the military has not been limited to that.
- As a local business man, I feel that the Community (DFL County) should not be located by a base full of 50,000 people concerning our population.
- The low level flights & bombing has irrevocable effects on the base and the new plane and instrumentation. I can't see that this noise change is likely to occur.
- The Environmental issues go not a concern of the District, Camp and other flows over the area. A lot of the money spent what can you damage?
- I feel the ranches and the DFL on have a double responsibility and for the other Mesa. Concerning the withdrawal of the base from DFL area to change in Tuleman.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Ed Brabson
ADDRESS: 1407 Science dr
CITY: Alameda NM 88311
STATE/ZIP CODE: _____

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 22665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 1-23-97

Support the effort being made by the Alameda chamber of commerce to promote the growth of military installations and the German Air Force as well as project connected with the missile range.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Paul J. Tapia
ADDRESS: 1710 Alamo Ave.
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:
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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 22665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/23/97

I strongly support the planned expansion of the German Air Force training operation at Holloman AFB. Holloman AFB is the development of a dedicated bombing range to support German AF training and current and future US AF missions at Holloman AFB and continued withdrawal of McGregor Range lands. All of this is a necessary part to the economy and growth of Otero County and Alamogordo.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Loretta Reyes - Priest
ADDRESS: 3199 N. White Sands Blvd.
CITY: Alamogordo
STATE/ZIP CODE: N.M. 88310

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
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WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 23 Jul 97

I am very happy to have the GAF here. Naturally there is a predicted economic impact on Alamogordo and also on me. In addition to the direct impact, however, if the indirect impact - that is, other economic impact helps to expand and improve the facilities for HAFB (Alamogordo's 14th Bomb) with results reaching far beyond the projected time of the GAF's stay at Alamogordo. I believe. If we need to expand the facilities to accommodate them, I certainly feel that it's worth while. I'm afraid that if we cannot (or will not) expand, they might eventually have to move to other quarters.

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Norman D. Lintley MD (Thurston 08/60)
ADDRESS: 1212 9th St
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

July 23, 1997

Ms. Sheryl Parker

HQ ACC/CEVA

129 Andrews St., Ste 102

Langley AFB, Va 23665-2769

RE: Holloman AFB, German Air Force.

Regrettably I was not able to attend any of the public hearings in Lincoln County New Mexico regarding the establishment or expansion of the German Air Force at Holloman AFB. I hereby vigorously protest not only the expansion, but the very presence of a foreign military on American soil.

First, environmentally the German Aircraft do have an impact on our environment. They are noisy, and their emissions contribute negatively to our air quality. It has been revealed to me by an officer at Holloman that the reason the German's need a location outside of Germany is that their own people will not tolerate the nuisance.

Secondly, the German jets violate restricted air space regularly. My family, friends and myself have all seen German Airforce jets flying low, and through the canyons practicing their maneuvers. It is a disrespect of a privilege that should not have been extended in the first place.

Third, I have questions that I would like answered.

- 1) How does a foreign military get security clearance on an American Base that American civilians cannot get?
- 2) How does allowing a foreign military to occupy American soil serve the security of this country?
- 3) How does allowing a foreign power to own or lease any part of our country serve it's people?
- 4) How is this act, to allow German Military to lease an American Base on American soil not constitute an act of treason by the Congress of the United States, and the American military.
- 5) How are we, the American people, and the New Mexican citizens protected from military interference, or intervention, by Germany in the event of American internal conflict?

One Congress man has justify his betrayal of the American people as a financial benefit to America, by the value of the lease. If money is the primary consideration in this issue than I suggest closing our bases overseas, particularly in Germany, and sending the German's home. America can take care of American security, and Germany can take care of German security.

page 2 of 2

Lastly, my family were victims of the Holocaust. Germany occupied Holland, and inflicted pain on my family less than sixty years ago. Germany is a country that has tried to take over the world in our life time. In this generation the Nazis are alive and well in Germany. This issue of World War II is not dead. Although we do not bare ill will toward the Germans, inviting their military to fly over our homes and practice their military maneuvers in our back yard to too outrageous.

'If vinegar doesn't work, use honey.'

You are giving our country away, to Germany, China, Japan, as well as England, Russia and who ever else is bribing our so called leaders.

Stop this treason, stop this abuse of our people and our resources. There's not much left.

Sincerely,

Anna Vanderlaan
Anna Vanderlaan

Living in Ruidoso

Mailing Address:

Projected Section 34 T.17N.R.9E.

within the Santa Fe Land Grant

c/o 1704-B Llano Street Box 261

Santa Fe, New Mexico

cc: Representative Steven Schiff

Colonel Thomas F. Gioconda

Senator Jeff Bingaman

Senator Pete Domenici

With explicit reservation of all my
unalienable rights, without prejudice,
pursuant to U.C.C. 1-207 and U.C.C.
1-403.6

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-24-97

William E Angelina Bennett
Strongly Support The Expansion of German Air
Force Operations at H A F Base NM

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: William E Angelina Bennett
ADDRESS: PO BOX 34862
CITY: Alamogordo NM
STATE/ZIP CODE: 88311-3462 (505) 437 6784

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-3769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 24 JULY 97

WE SUPPORT THIS PROJECT AND A
STRONG MILITARY DEFENSE.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: DR. T. Parker commander new post 7612
ADDRESS: 700 Highway 70 West
CITY: Alamogordo
STATE/ZIP CODE: NEW MEXICO 88310

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**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-24-97

In response to the proposed Air Force Bombing and Practice Range, I am very much in favor of this proposal and endorse the Government's decision to provide Otero County / Alamogordo with such a tremendous opportunity for economic development.

As a business owner and resident of Otero County, I feel privileged that the German Air Force has selected Holloman Air Force Base and the surrounding area to pursue their training objectives.

The new bombing range will boost our economy and is just what Southern New Mexico needs.

The proposed range site was well selected, and because of this, the impact on the natural environment will be very minimal. A rather small price to pay in exchange for the amount of economic and business growth that will come to Otero County / Alamogordo as a direct result of the proposed range.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Yvette Trawick

ADDRESS: P.O. Box 371

CITY: La Luz

STATE/ZIP CODE: NM 88337

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA

ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Ms. Sheryl Parker, Air Combat Command Environmental Analysis Branch
129 Andrews Street
Langley AFB, VA 23665-2769

July 24, 1997

Dear Ms. Parker:

On balance, the proposed expansion of the German Air Force Operations at Holloman Air Force Base is probably good for the economy of the area. There are, however, several good reasons to limit the scope of the proposal to one of the two options for the new target areas.

Because of fairness and in consideration of our government's past record of environmental abuse, I feel the Otero Mesa Option site should not be developed as a new target area in the proposed expansion.

In going over the draft Environmental Impact Statement or EIS, it became clear that the Air Force would probably prefer to use Otero Mesa Option for a new target area as opposed to the Tularosa Basin Option. Reasons are: The Otero Mesa site is cheaper—construction would cost only \$4 million compared to the \$20 million for the Tularosa Basin site. There is an escarpment that limits the delivery patterns that can be flown in the Tularosa Basin Option. There is no such steep slope in the Otero Mesa Option and so more maneuvers can be carried out on each training sortie. Continued Army use of Tularosa Basin site would mean that the training flights would have to be coordinated between the our Army and the German Air Force. No such problem exists at the Otero Mesa, since the Army is not using it.

However, our local ranching community is strongly against the Otero Mesa Option being used in the proposed expansions of the German Air Force for a variety of reasons. The main reasons are that low-level flights are going to have a detrimental effects on their livestock and that grazing and recreational use of the Mesa will be lost to the proposed target area.

For well over half a century, ranchers in this county have been asked to give up more and more of their land (and livelihood) for the good of the nation. They abandoned land where Holloman AFB, White Sands Missile Range and McGregor Range now sit and cooperated with the government because their patriotic feelings. Now, however, they are being asked to give up more grazing land and put up with more damaging overflights in the name of the *German Air Force*. We are not involved in a war, not even a cold war, and this is not our country's armed forces that wants more training area. Clearly in the name of fairness, its is time to listen to the ranchers.

But if you want to ignore the fairness and just look at the logic, then lets do that: National law says that the environmental impact of these proposed actions must be considered before a decision may be made on the proposed expansion. If you noticed the figures above, it will cost \$4 million to prepare the Mesa site and \$20 million to prepare the Basin site. Why the difference? The extra \$16 million is to clean up the environmental damage caused by the military that has been using the Tularosa Basin site as a target area.

That's right: the big cost difference is because of the environmental damage done to the target areas already being used—there may be live bombs in the ground that have to be removed before the necessary targets can be built. So now the government apparently wants to use a clean area, the Otero Mesa, instead of cleaning up their environmental damage at the Tularosa Basin site. Environmentally speaking, this is a no-brainer: Don't allow them to ruin the environment of a new area. Clean up the existing target area so it can be used by both our Army and the German Air Force—don't expand the environmental destruction.

Sincerely,

Gary Wood
Gary Wood, Editor Mountain Monthly
PO Box 556, Cloudcroft, NM 88717

U-137

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-24-97

I strongly support a strong military defense, and would like to go on record as supportive of the German Air Force being here in Alamogordo, NM.
The cultural differences have only served to enhance Alamogordo. Our young people are now exposed to another wonderful culture. We are so happy to have this exposure with a fine group of young people that the German Air Force has allowed us to meet

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Cynthia A. Myers
ADDRESS: 205 Niagara
CITY: Alamogordo
STATE/ZIP CODE: New Mexico, 88310

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/25/97

I am writing in support of the HAFS bombing range expansion. As a physicist in the area of an environmental impact statement, the military has made forward world peace.
Further defense strategy and development is absolutely critical. Furthermore, close training with our allies becomes even more critical. The German air force presence has made a positive impact on our area and will only further serve to strengthen our commitment to world peace through unified efforts. We must allow and encourage ally strength and peace and begin to relinquish the sole responsibility of world governance, a problem that is about to bankrupt us.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Douglas R. Dinkens
ADDRESS: 7401 10th St SW
CITY: Alamogordo NM 88310
STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Friday, July 25, 1997

Ms. Sheryl Parker
Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA,
Langley AFB, VA 23065-2761

RE: Potential Environmental Impacts of German Air Force Operations and
Establishment of a German Air Force Replacement Unit at Holloman AFB, NM.

Dear Ms. Parker,

By way of introduction, I was stationed at Holloman AFB from 1967 until my retirement in 1972. I remained in this area since that time, working for various contractors at HAFB and White Sands Missile Range to the present time. I plan to spend my remaining years in this area, which is the reason for my interest and concern for the subject of this environmental study.

The proposed action would include the beddown of 30 German Air Force Tornado aircraft and the location of 640 additional personnel (and their families), in addition to the construction of associated support facilities.

I'm sure the primary consideration of the study is the potential for the NATURAL environmental impact. This portion of the study and responses to it are being and have been adequately made by the U.S. Bureau of Land Management, local ranchers, and the general public.

Equal consideration should also be given to the socio-economic impact on Holloman AFB itself and the surrounding communities. Certainly, the business portion of the community (including the Alamogordo Chamber of Commerce) heartily endorse the expansion of the mission of Holloman; based on the certain potential for increased revenue from the construction planned for the base, as well as the increased income from the new residents.

Local area housing costs have already sky-rocketed with the German Air Force personnel now present; these increases affecting the local populace as well as the German Air Force personnel already present.

On Holloman AFB itself, the parking lots are already overcrowded at the Base Exchange, Commissary and the Hospital; especially on military paydays. To date there has been no hint of this condition improving. The German Air Force personnel who are here now are sharing our USAF Hospital medical staff, who are already severely short-handed given the population of this facility. It hasn't been but a few years since our hospital had an Emergency Room; then with the down-sizing it was reduced to the status of an Acute-Care Clinic; open only during normal duty hours. Within the past few months it has further been reduced to a "same-day care clinic"; but don't bet more than even money on being able to see a physician, especially a real USAF doctor. More likely a patient is referred to the local hospital in Alamogordo, and a contract physician, especially if the patient is a dependant or retired military person. And this is THE home of our high-profile (publicity-wise) Stealth "Fighter"; the F-117.

We've been told that the German government is paying for all the services and facilities they're receiving here, and that's as it should be. But how about using some of those funds to increase the level of support for our own personnel and their families. Believe me, though I'm a retiree, I have heard similar sentiments expressed by some of my active duty friends on the base.

I would strongly suggest an alternative to the search for new target ranges for use by the German Air Force Replacement Training Unit; which I'm certain will be coming to our shores eventually. I can guarantee this alternative will not be popular with either the local business community or the Commander of Holloman AFB; whose prestige and career would certainly be enhanced by the addition of the GAF organization.

A few years ago, Williams Air Force Base, AZ was closed as part of congress' military downsizing mandate. Williams AFB was originally built as a pilot training facility, and supported that mission flying T-37 and T-38 aircraft for many years. The base has two very long parallel runways with ample overrun space that is flat and clear. I'm familiar with Williams AFB because I was stationed there from 1964-1966. Since I left new facilities were built for the hospital, commissary, base exchange, headquarters and many of the other standard base organizations. This last May, I had occasion to be in the Phoenix area, and went to see what was done with Williams.

To my surprise, it hadn't become a thriving industrial air center as I would have expected, but is sitting practically dormant, with most of the new structures unused. The new hospital is being used by the Veteran's Administration as a medical facility, but as far as I could see the base is about 90% unused. We drove through the housing area where we used to live and found none of the homes being used; but still in marginally

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/25/97

My family and I have family and friends in the Alamogordo Mesa in Southern New Mexico and West Texas areas. We wish to petition you to please consider the ranchers their livestock, the wildlife, the beautiful land and environment. No amount of money can compensate for the loss this community will suffer - a loss that will be forever.

Please, No More German Air Force!
No low level flights!
No bombing range!

NAME: Maurice Chutey

ADDRESS: 5868

CITY: Salisbury MD 21881

STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

sound looking condition. I respectfully suggest that rather than add to the congestion here at Holloman AFB, the appropriate mechanism be put into action to re-activate Williams AFB as a major training facility for the German Air Force. They could have at their disposal a whole Air Force Base set up PRIMARILY to satisfy their needs, both militarily and socially.

I realize that the Commander of the German troops training in this area wouldn't be too fond of this suggestion, and would prefer to have all his troops located physically close to his headquarters at Ft. Bliss, TX. That is a political matter, and would need to be addressed separately.

There is more than adequate target range available in the near vicinity of Williams AFB; the Barry M. Goldwater Air Force Range has in excess of 2900 square miles within its boundaries, and the Yuma Proving Ground should also be able to provide some of its area. The topography is varied enough to provide whatever is required for the training of the Tornado pilots, with no more necessary construction than would be needed here in the Tularosa Basin.

While I realize that these comments and suggestions will be met with resistance and opposition from some quarters, I also believe they would also receive hearty endorsement by others. It's in that spirit that I submit them for the consideration of you and your staff.

Sincerely yours,

Douglas W. Tyler

Douglas W. Tyler

Douglas W. Tyler

P.O. Box 908

Holloman AFB, NM 88330

Sheryl K. Parker
 HQ ACC/CEVA
 129 Andrews Street
 Suite 102
 Langley Air Force Base, VA
 23665-2796

July 26, 1997

Dear Ms. Parker,

This is regarding the proposed expansion of German Air Force operations from Holloman AFB. I live in the foothills of the San Mateo Mountains east of Dusty, NM almost directly beneath flight path VR-176. Your plan of doubling the number of sorties daily on this path is unacceptable. One of the reasons we moved here was for the quiet. We have been startled, awakened, irritated and annoyed by existing overflights including sonic booms no one will take credit for. The training of foreign troops is NOT a valid reason to further erode our quiet and tranquility.

In addition, this flight path flies over the Withington, Apache Kid and Gila Wildernesses reducing the quality of recreation there where great effort has been spent to maintain land that is civilization free.

The effects of noise from low altitude jets on wildlife beyond the immediate startle (which is bad enough) are not well known. Therefore you cannot claim insignificant impact. You are flying over spotted owl nesting areas. Might they abandon nests and/or young? Also, West Red Canyon is a prime elk calving area. How many abortions will your flights induce? How many elk will stop lactating? The effects of noise on mule deer which are declining throughout the region are also largely unknown and their reproduction may suffer.

Given these unknowns and the discomfort caused by the noise of low altitude jets to humans, please reconsider your proposal and reject it.

Sincerely,

Mary C. Ray
 Dusty Rt
 Winston, NM
 87943

**Draft Environmental Impact Statement
 Expansion of German Air Force Operations at
 Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: July 27, 1997

PLEASE PRINT

I strongly support the planned expansion of German Air Force training operations at Holloman AFB (Holloman II), the development of dedicated bombing ranges to support German AF training and current and future USAF missions at Holloman AFB, and the continued withdrawal of MC Gresser Range lands.

This is not just for "German Air Force." While the German Air Force is providing the motivation and 60% of the funding for the range development, this range would ultimately act as an "insurance policy" to ensure HAFB's continued existence and support future missions with Title Downer sizing of our defense forces, yanked for these facilities is more urgent and important to the AEFORGE especially in case of any conflict around the world and need to expand our forces.

The BLM is the major lobbyist against the project. My observation of the BLM is that they zealously guard all BLM as their own and not admitting that this land belongs to all of us and should be used for the nations greatest need, i.e. AEFORGE bombing ranges. If they can't be agreeable on this request, then a Presidential Directive to the BLM would be in order. If successful negotiations can't be accomplished, I recommend Presidential assistance be requested.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: GLENN W. TALLEY

ADDRESS: 1516 SERRANO

CITY: ALAMOGORDO

STATE/ZIP CODE: NEW MEXICO 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]
 Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
 HQ ACC/CEVA

ATTN: MS. SHERYL PARKER
 LANGLEY AIR FORCE BASE, VA 23665-2796

w-139

w-140

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 27 July 97

I support the growth and development of the Bombing Range at MC Keesler. I started this as the Range Commander in 1987. This Range is desperately needed. Holloman is the life of Alamogordo. Without it we are the best Range in AEC, however when this puts the Air Force at a great disadvantage. An additional Range will help alleviate this problem. In addition, this new Range will allow expansion of Holloman AFB with Gou cut backs of Sams Studio to turn back costly development in the effort to be paid in another country. I have seen what happens to an area when the sole support of that community leaves. We have a number of people who have some financial growth in our area at little to no cost to us - lets do it.

SLM has done nothing but eliminated the recreation in our area. This is an outdoor Area which to enjoy the water in which BOM closed this - for what? BOM messed up the new High School in Cloudcroft - for what? What kind of they get from us - They don't live here. They put RD money in our economy. Lets move forward.

I was the Bombing Range Commander from 87-96. I will

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Jim Talbert

ADDRESS: 506 Sussman Ave

CITY: Alamogordo

STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

be glad to speak in favor of this development here in Washington. I want the German Air Force Liaison office and I worked all things in Europe at the Headquarters level. I have spoke to congressional staff on Range for the Heller Range in the past.

27 July 1997
P.O. Box 267
Marfa, Texas 79843
915-729-3320

Ms. Sheryl Parker, HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, Virginia 23665-2769

Re: Increase in low level (100 ft. at 500 mph.) training flights over far West Texas

I wish to object to the increase in low level flights over West Texas as I objected previously to the initiation of any flights. I want you to know that there were at least two low level flights over my home prior to any public hearings. Therefore, I do know how they feel and how they sound.

I am concerned about the environmental impact of the noise and the terror it engenders. My first reaction (quickly controlled) was to dive for cover. It is impossible for me to imagine that this does not affect wildlife adversely. There must inevitably be injuries as creatures flee for cover. And, what about the long term effects? Birds and animals must change their nesting, feeding, etc. habits to avoid the noise of these jets. What will that mean to their ultimate survival? I'm sure that you are aware of the endangered peregrine falcons that nest in Big Bend National Park. Big Bend and Balmorhea are home to many, many birds and many migrate through this area.

And, the economic impact? Tourists come to this area because of its unspoiled nature. There is peace and quiet and space and the opportunity to see wildlife. No one comes to be terrified as jets fly 100 feet overhead at 500 miles per hour. I even dare suggest that it is a benefit to the entire country to have a few places in this country where any one can get away from it all. What about impact on the movie industry? It is my understanding that this area is selected for filming precisely because there are few flights in the area and that this area is selected for filming of period pieces. The ranching industry must also be affected as their animals are as negatively impacted as the wildlife. I wonder about the cumulative impact of noise on structures; I am thinking in particular of the tomato greenhouses. Is there any economic benefit to West Texas?

And, the cost of these new facilities in New Mexico?

I don't understand the reason for training people to fly planes they cannot fly in their own countries. I'm sure I could learn to drive a Rolls Royce, but what's the point, since I'll never own one? If the Tornados are essential to the defense of another country, why

aren't they learning to fly there? Wouldn't it be much more cost effective and much more sensitive to the needs of our citizens to have our personnel travel there and train them and train some of their personnel to become instructors and mechanics? What would happen if there was a conflict requiring Brits, Germans or whomever to fly Tornados? Will they all have to fly out of the United States? Or will we have to send them maintenance personnel because no one in their own country can perform those tasks.

Therefore, I would like specific answers to the following questions:

- 1) Why are foreign nationals training in the USA instead of their own countries?
- 2) Why can't U.S. personnel train them in their own country?
- 3) What will the trained personnel do with their training when they return to their country?
- 4) Is it true that the German and British citizens have refused to allow these flights in their countries?
- 5) What is the total cost of building these new facilities in New Mexico?
- 6) What is the projected economic benefit to the State of New Mexico?
- 7) What is the projected economic benefit to the State of Texas?
- 8) Are there other negative physical effects of these flights, such as vibrations, wind currents?
- 9) What studies have been done on the possible negative economic effects on such industries as movies, tourism, ranching and tomato farming?
- 10) What studies have been done on the effects of noise on wildlife and ranch animals- both short term and long term?

I have not forgotten the risk to life and property of these low level flights. Or the increased stress levels of persons exposed to these very frightening flights.

I shall look forward to hearing from you. If I have failed to make some of my questions clear, please feel free to contact me.

Sincerely,

Dianne Gilbert
Dianne Gilbert

cc: Sen. Kay Bailey Hutchison
Sen. Phil Gramm
Rep. Henry Bonilla

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 28 July 97

I fully support the national intent to expand the German Air Force (GAF) training mission at Holloman AFB and the USAF role in supporting the expansion. America made an agreement with Germany and we must keep it.

USAF support of GAF expansion by constructing a new bombing range on McGregor Range already set aside for military training, the country keeps its agreement. Holloman AFB becomes more secure from BRAC actions and USAF F-117A training is enhanced/bettered as well as GAF training.

Economically, the economy of Otero County is to gain enormous benefit that increased GAF population will create. Our rising 7.6% unemployment rate will decline as the GAF population increases. Over 100 direct support jobs will be created as well as the construction and future government contract support jobs that may occur.

Little will really change if the range is built (over) CONTINUE ON BACK FOR MORE SPACE

NAME: George E. Bussing Lt Col USAF (Ret) George Bussing
ADDRESS: 21 Carmine Valley Verde
CITY: Alamogordo NM 88310
STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ()

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-1769

McGregor Range is already a military maneuver area and the bombing range will take up only 8 square miles of 1,060,000 miles encompassed by McGregor Range. Yet, some agricultural impacts will occur. But no more damage to the land will occur than already in occurring from stock grazing and current military operations. In fact, less damage may be a more accurate estimate because of USAF and national policies that mandate range clean up and preservation. Stock grazing elsewhere and private land owners, if any private land is impacted, can be compensated.

I have every confidence that the USAF will work to minimize noise and low level flight issues.

The local population will hardly be aware of a change when operations at McGregor Range begin. So, build the Range! The GAF needs it, the USAF needs it, Otero County needs it . . . and the nation needs it. And keep Holloman AFB on the BRAC "protected" list, Otero County needs Holloman AFB.

George E. Bussing

July 28, 1957

To: Mrs. Sheryl K. Parker
HQ ACC/CEWA
Langley Air Force Base, VA.

Dear Mrs. Parker

My name is Jack Wilson, I am a cattle rancher from Magdalena New Mexico. I am writing to you to voice my opposition to the German training flights that we see to start in the near future. We have a cattle ranch south of Magdalena that is in the bottom of a valley approximately 10 to 15 miles wide, and we already get a considerably large amount of training flights from Holloman & Kirtland air force bases. These flights are usually at a very low altitude and as you know can be very loud. Air force pilots do not know what we have to put up with out here in the areas that they use for low level flights. They think that just because there is not a populated area near them, that nothing is going on for anybody. We miss those jet airplanes blarney every time they fly thru here, but that is not a word, but we can do about it, so we just put with it. We all know we need a good air force so we understand that they need the training. Now, if we have to put up with more training flights, and flights that the German air force are going to make in our area, we will definitely be against the program. I would like to know why the German air force is training here in the first place. Don't they have any areas they can train in back in Germany?

We are concerned about this program and I hope I do not find out that some of our taxpayers are going toward financing the German air force. Again, I am against this training program and I hope you will consider our concerns. Please contact me or keep me informed about the program.

Thank you

Jack Wilson
P.O. Box 186
Magdalena, New Mexico
87825
505-854-2615

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-28-97

I strongly support & believe that a strong military defense & continued support of our neighbors at HAFB is vital to our community & country.

I strongly support the development of a dedicated bombing range to support current & future USAF & allies missions at HAFB.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Toba Marguader
ADDRESS: 3150 Hamilton Rd
CITY: Alamogordo, N.M. 88310
STATE/ZIP CODE: N.M. 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: JULY 28, 1997

IT SAVEDS ME TO KNOW THAT SO FEW ARE MAKING THE MOST OF THESE ABOUT THE PROPOSED BOMBING RANGE AND THERE LACK OF SUPPORT FOR IT. HOLLOMAN EXTREMELY IS VITAL TO THE SURVIVE OF ALAMOGORDO.

I STAND IN FAVOR OF HAVING THE BOMBING RANGE ON THE MESA SINCE IT IS THE MOST IDEAL PLACE WE ARE HAPPY TO HAVE THE GERMAN AIR FORCE HERE AND WOULD LIKE FOR THEM TO EXPAND THEIR NUMBERS. THEY ARE A VERY SKILLFUL PEOPLE TO WORK WITH AND CERTAINLY ARE GOOD FOR OUR ECONOMY.

PLEASE DON'T LET THE LOUD VOICES OF THE MINORITY OVERCOME THE SOMEWHAT SILENT VOICES OF THE MAJORITY. ALAMOGORDO AND ITS RESIDENTS WANT THIS TO HAPPEN

I Thank You.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Mark Eaden (EZ TV & Apples)
ADDRESS: 1307 TENTH ST
CITY: ALAMOGORDO
STATE/ZIP CODE: NEW MEXICO, 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 28 AUG 97

I am in full support of this project.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JOHN R. GREGG
ADDRESS: 2901 SUNDANCE
CITY: ARMUERO
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 28 AUG 97

I BELIEVE THAT OTHER COUNTRIES AND ARMED FORCES WOULD
REAGIT GREATLY IF A DEDICATED BOMBING RANGE WAS DEVOTED
TO SUPPORT GERMAN AF TRAINING AND FUTURE USAF MISSIONS
AT HOLLAMAN AFB.
ARMUERO WOULD ONLY IMPROVE WITH THE INFUX OF
PERSONNEL INTO THE BASE & CITY. THE GERMAN AND SUBSEQUENT
OTHER MILITARY MOVEMENTS SUPPORT OUR ECONOMY AND
GIVE IT THE BOOST THAT IT NEEDS. SUPPLIES JOBS FOR
CIVILIANS AND ENSURES THAT ARMUERO CONTINUES TO
IMPROVE AS A CITY.

I WOULD BE VERY SUPPORTIVE OF THE EXPANSION OF

GERMAN AF OPS AT HOLLAMAN AFB, NM.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: A J G WRIGHT
ADDRESS: 3117 SUNDANCE AVE
CITY: ARMUERO
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ()

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

July 28, 1997

Dear Mrs. Parker,

I have heard that the German Airforce will begin training flights in New Mexico and I am concerned. We have many American airports flying over our rural area everyday, why should we have foreign flights disturbing us too? Why are they training here? I hope we Americans are not funding this project. I am extremely against this.

Thank you,
Amanda Montoya

7-28-97

To: Ms. Sherry Parker
HQ AOC/CEVA

FROM: S. W. Shank
POB 1554
Hope, N. M. 88250

RE: German AF operations expansion
Holloman AFB

My ranch and farm is over the mountains from Holloman AFB but I am concerned about noise generated by flights and what impact it will have on my animals and myself.

I oppose any flights that are close to the ground whether they be 100 or 500 feet.

I stand to lose animals, property value and the peace of my area of the world will be disturbed. There is no way you can be compensated for an increase in noise level.

July 28, 1997

Ms. Sheryl K. Parker
HQ ACC/CEVA
129 Andrews Street
Suite 102
Langley Air Force Base, VA 23665-2796

Dear Ms. Sheryl K. Parker:

The purpose of this letter is to voice my opposition to the German Air Force using VR-176 for training. I feel that so many sorties being flown over our area will have a very negative impact on people, livestock, wildlife and very possibly homes, etc.

Thank you for your consideration of this matter.

Sincerely,

Bernard H. Hunter

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street
Suite 102
Langley Air Force Base
VA. 23665-2769

Dear Madam;

I oppose the building of facilities for the Germans on McCreor Range, and the building of new targets complex on the Otero Mesa.

I want to know when are American citizens who are kicked of their Private Property and their way of making a living to accomodate Foreign Governments, German Or Chinese when is it going to end.

Chinese are to be handed America's shipping Ports and ship building ports and coal mines in Utah . When is the violation of the Constitution going to stop.

Respectively Yours,

Ruth Tanner

By 304

Pinn, N.M. 8834

July 28, 1997
Pinn, N.M.

Louise Holder
15 Calle de Juana
Alamogordo, NM 88310

July 28, 1997

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

I am in support of the planned expansion for the training operations at Holloman AFB and the development of the dedicated bombing range for future USAF missions from Holloman Air Force Base and the German Air Force Training.

My husband and I moved our family to Alamogordo, New Mexico in 1954. We became active in the community and my husband made numerous trips to encourage growth and development in Alamogordo. The economy of Alamogordo is very dependant on Holloman AFB and the military jobs as well as civilian jobs that are out there. I feel having the German Air Force here will be a big asset to our community.

The dedicated bombing range at MacGregor Range would be beneficial to Holloman for future missions as well as the German Air Force for their training.

I would urge you to vote favorably on the Holloman II phase and the dedicated bombing range on MacGregor Range.

Thank you,

Louise Holder
Louise Holder

-30- Company
Genie Harshey, Trustee
P.O. Box 386
Alamogordo, NM 88310

July 28, 1997

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

I would like to express my support of the planned expansion for the training operations at Holloman AFB and the development of the dedicated bombing range for future USAF missions at Holloman Air Force Base and the German Air Force Training.

I have been in Alamogordo for over 40 years and know that Holloman AFB is a big part of the Alamogordo economy. My husband is employed by Civil Service at Holloman AFB and works at the high speed test track. These jobs are essential to Alamogordo area residents.

I feel having the dedicated bombing range at MacGregor Range would be beneficial to Holloman for future missions as well as the German Air Force for their training.

I would urge you to look favorably on the dedicated bombing range on MacGregor Range which would also allow for the expansion of the German Air Force to Holloman AFB.

Thank you,

Sincerely,

Genie Harshey

Genie Harshey, Trustee
-30- Company

Dickie Harshey
15 Calle De Juana
Alamogordo, NM 88310

July 29, 1987

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

I would like to express my support of the planned expansion for the training operations at Holloman Air Force Base and the development of the dedicated bombing range for future USAF missions at Holloman AFB and the German Air Force Training.

As an employee at Holloman Air Force Base with the High Speed Test Track, I know the impact Holloman has on Alamogordo economy. The dedicated bombing range at MacGregor Range would be beneficial to Holloman for future missions as well as the German Air Force for their training.

I would urge you to vote favorably on the Holloman II phase and the dedicated bombing range on MacGregor Range.

Thank you.

Sincerely,

Dickie Harshey
Dickie Harshey

Genie Harshey
P.O. Box 1809
Alamogordo, NM 88310

July 28, 1987

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

I am in support of the planned expansion for the training operations at Holloman AFB and the development of the bombing range for future USAF missions from Holloman Air Force Base and the German Air Force Training.

I have lived in Alamogordo, New Mexico for most of my life. My father was very active in the community and made numerous trips on behalf of the community to encourage growth and development in Alamogordo. He worked very closely with the command at Holloman Air Force Base and encouraged community/base involvement. I feel having the German Air Force here will be a big asset to our community.

The dedicated bombing range at MacGregor Range would not only be an asset to Holloman AFB for future missions they may make, but would also help the German's with their training.

Otero County has a lot of open space to allow for training for many of the military missions, unlike places which have built cities right up to the military bases.

I would urge you to vote favorably on the Holloman II phase and the dedicated bombing range on MacGregor Range.

Thank you,

Genie Harshey
Genie Harshey



July 29, 1997

U. S. Air Force
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, Virginia 23665-2769

ATTN: Sheryl Parker, EIS Project Manager

A copy of the Draft Environmental Impact Statement (DEIS) for the Proposed Expansion of German Air Force Operations was briefly reviewed at the City of Truth or Consequences Public Library. A copy of the DEIS was ordered and, when received and studied in more detail, additional issues or concerns may be identified.

In an attempt to meet the August 4, 1997 deadline concerns and general comments will be limited to those identified during the initial brief review of the DEIS.

The Armendaris Ranch (Pedro Armendaris Land Grant) of New Mexico Ranch Properties, Inc. consists of 352,000+ acres of private property most of which is on the east side of the Rio Grande River between the Elephant Butte Dam and the south boundary of the Bosque del Apache Wildlife Refuge. The eastern most part of the property contains portions of the WSMR restricted airspace safety areas AEROBEE 350 and Abre 4A. The area currently contains 1600 bison. The following concerns are limited to activities that will occur in MTR VR 176 short in the DEIS and AEROBEE 350.

The status of some wildlife species have changed or were evidently unknown at the time wildlife information for the draft was gathered. Additional information that should be considered in the DEIS is as follows:

1. [w-154] Desert bighorn sheep have been established on the Fra Cristobal Mountains and now represent the largest single group of sheep found in New Mexico.
2. [w-155] The Fra Cristobal Mountains are being considered as a potential release site in the USFWS California Condor recovery program.
3. [w-156] Black-tailed prairie dog colonies have been re-established.

U. S. Air Force
July 29, 1997
Page #2

4. [w-157] The Jornada Bat Caves (UTM 326159E, 3707447N) (Lat/Long 33° 13' 12N, 106° 52' 30W) provides habitat for 8 species of bats of which the Mexican free-tailed bat populations is the largest in New Mexico and 5th largest in North America. The average number of bats using the caves varies from 200k to 500k but may have as many as 5-8 million during migration. The caves also contain the largest known winter hibernaculum of Townsend's big eared bat. Low level flights over this area, when bats are leaving or entering the caves, may have detrimental effects on both aircraft and bat populations. The area, located in AEROBEE 350, may qualify as an Excluded Land Use Area.

5. [w-158] Aplomado falcon habitat suitability and prey species abundance studies have been completed. The results indicate the area is within historical range and in excellent condition as a release site for this species.

General concerns are based on experiences with current training activities of various military aircraft which can only increase with the Proposed Expansion of German Air Force Operations.

1. [w-159] Low level flights over groups of wildlife or bison, either intentional or unintentional, by curious pilots could be disruptive to ranch operations.
2. [w-160] Civilian aircraft are frequently flown at low levels to patrol ranch boundaries, monitor the bighorn sheep populations, locate bison during round-ups, and survey antelope or deer populations. These activities could be further limited beyond WSMR airspace restrictions by either safety concerns or new airspace restrictions.
3. [w-161] The DEIS does not mention the potential for fires caused by exhausts of low flying aircraft that make a steep ascent. Only one such occurrence, by A-10s, was suspected to have occurred during the current owner's occupancy of the property. Previous residents have claimed this has occurred in the past.

U.S. Air Force
July 29, 1997
Page #3

After a more detailed review of the DEIS is completed, additional issues or concerns may be identified and comments made after the deadline. If you have any questions or need additional information, feel free to contact me at 505-894-6782.

Sincerely,

Thomas E. Waddell

Thomas E. Waddell
Manager

TEW:dlw

Written Comment Sheet

Mission and Master Plan Programmatic Environmental Impact Statement Fort Bliss, Texas and New Mexico

Thank you for your input

PLEASE PRINT

DATE: July 29, 1997

As a business in the area of Alamogordo, Holloman and the remainder of Otero County, I highly resent the presence of a foreign nation having the opportunity to conduct military exercises on American soil.

Since the German military had no problem in training for WWI in its own country, I fail to see a reason to open our land to it for maneuvers that will prove detrimental and even hazardous to Americans and to wildlife in this area.

There are large air bases on Sicily with vast areas of desert within flying distance for low-level, high-decible exercises (Libya to mention only one).

Holloman AFB has existed as an economic asset to Otero County for 50 years and will continue to do so without expansion of the German Air Force in the area.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Jimmy D. Wagner-dba Beeson Electric Service Co
ADDRESS: 841 Leborcita Canyon Rd.

CITY: La Buz

STATE/ZIP/CODE: NM 88337
1-505-437-7777

Please check if you would like to receive a copy of the Draft Environmental Impact Statement. ☐

Please Hand This Form In, or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA ATTN: MS. SHERYL PARKER
LINGLEY AIR FORCE BASE, VA.
23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-29-97

I view this effort as having a very positive strong impact on the economy of Bernal County with minimal environmental damage. I feel this project should go forward and be supported by all state & federal agencies. This project could provide a basis for future consideration on similar missions for our local base. It assists in demonstrating support for our military contingent with an eye on future growth.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-29-97

I am in support of Air Force bombing range. As a builder my wife could easily hear bombs but my concern is for our community as a whole. I believe our town needs to diversify its growth with some clean industry such as the military. Let it employ our people. Should the range come to realization and when the dust settles from the mini building boom which is due to be created the long term economic impacts are what will continue to support our community. This type of support and growth will help to make possible potential opportunities for ourselves and especially our children. It is a concern that mine that my wife have an opportunity to succeed here in the field of their choosing. While growth is high likely that many opportunities will not be afforded them as a small town with few employment options. I believe that it to be imperative that this bombing range be allowed.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: James W. French
ADDRESS: 2272 Cielo Vista
CITY: Alamogordo
STATE/ZIP CODE: NM 88330

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JAMES W. FRENCH
ADDRESS: 2272 CIELO VISTA
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88330

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: July 29, 1991

IF WE HAVE ANY MORE PROSPERITY
LIKE THE CHAMBER OF COMMERCE
IT'S QUOTING WE WILL ALL, IN THE
PRIVATE SECTOR, BE BROKE
WE DON'T WANT THE LOW
LEVEL FLIGHTS, THE BOMBING
RANGE, OR MORE AIR FORCE.
THANK YOU FOR YOUR
CONSIDERATION.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Mel Dutton
ADDRESS: 1809 JUNIPER
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/29/91

Holloman AFB Base is part of Alamogordo's employment for the area. The increase
in the German AFB not only benefits Holloman, but Alamogordo to maintain
the people that depend on jobs in this area.

Supporting the increase in Germans will benefit all and not just the Air Force.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Sandra Slater
ADDRESS: P. O. Drawer J.
CITY: Alamogordo, NM 88310
STATE/ZIP CODE:

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 29 July 97

To whom it may concern,
I concur with plans to build
a bombing range for current and future
Air Force missions.

[Signature]

..... CONTINUE ON BACK FOR MORE SPACE

NAME: FRANKLIN D. ASHDOWN, M.D.
ADDRESS: 1301 CUBA AVE.
CITY: ALAMOGORDO, N.M. 88310
STATE/ZIP CODE: _____

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

No! To Low Level German Air Force flights on VR-176.
You have no idea how hostile the people are to this plan.
I moved to this area for peace and quiet.
If this is implemented you are squandering alot
of good will you might need for Air Force appropriations
during the next economic downturn.

Yours,
Ray H. Ray

Rayburn H. Ray
HC 30
Winston, NM 87643-9802



Ms. Sheryl K. Parker
HQ ACC/CEVA
129 Andrews Street
Suite 102
Langley Air Force Base, VA
23665-2796

Rayburn H. Ray
HC 30
Winston, NM 87643-9802

23665-2796

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-29-97

I support the expansion of German Air Force Operations at Holloman AFB and the Air Force having their own bombing range

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Dan Callinan
ADDRESS: 513 Riata Rd
CITY: Tulacosa
STATE/ZIP CODE: N.M. 88352

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-29-97

WE THE UNDERSIGNED FULLY SUPPORT THE ADDITION OF THE BOMBING RANGE IN THIS AREA. WE ARE SURROUNDED BY BLM CONTROLLED LAND - WHICH IS OF VERY LITTLE USE TO US N.E. IN MOST OF THE GENERAL POPULATION IN OUR DISTRICT. THE MILITARY OPERATIONS AND GROWTH IS OF GREAT IMPORTANCE TO THIS COMMUNITY AND TO OUR ECONOMIC SURVIVAL - WE HAVE NO INTENTION TO SPEAK OF - SO IT IS VITAL THAT THIS PROJECT AND OTHERS OF SIMILAR NATURE BE APPROVED.

THANK YOU

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JURI + GARMEN KENPERE
ADDRESS: 600 E. 18TH ST.
CITY: ALAMOGORDO N.M.
STATE/ZIP CODE: NEW MEXICO 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

7-29-97

Mr. Parker,
As a concerned resident of Guernsey,
New Mexico I request that the German
Air Force not be allowed to use our Army
VR-176 for training. At this time I
have flown to Prescott to Kirtland Air
Force Base, for damage done June 17th.
This was not German planes, but planes
out of California over my area. Two
windows were broken, my house new
through bare wire fences, and cracking
of a fire place.
If flights of flying this low and so
times a year can only cause further
distress and damage.

Thanks for your contribution
Anna Belle Thompson

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT I share, as all Chamber members do, the same
economic concern as stated in your letter of July
14, 1997. Holloman AFB is initially connected to the
economic well-being of Alamogordo, with reservations
I support the expansion of land-use by H.A.F.B.
However, we must not continually like in the
structure of housing to every which of H.A.F.B. and
our school - build military estate.
No military has historically had a ready habit
of buying, selling and later devoting of their land
to acquire the existing military structure in the
Pinalosa Basin. If the new lands added for
would have, some bears and for farmers, they are
against H.A.F.B.'s proposed expansion of their land
usage.

Also, as a member of the Pinalosa Chamber of
Commerce and an Over-Country take payer, I and
solidly against any low-level flights (jet
supercraft) over the Pinalosa Mountains. These
flights are totally disruptive to the peaceful
and tranquil lifestyle of those living in the mountain
what we need, in addition, complete without
prostituting our residents' rights of a tranquil
lifestyle by allowing Holloman AFB to have carte-blanche
**** CONTINUE ON BACK FOR MORE SPACE **** freedom for we
supposed need.

NAME: Robert Coburn
ADDRESS: RR Box 568
CITY: Highgate
STATE/ZIP CODE: NM 88325

Robert Coburn

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-29-97

Southwest Air Systems, Inc. is in favor and will support a strong military defense at Holloman Air Force Base. The base continues to give Alamogordo and Otero County support through much needed jobs and financial support. This is not just with the increase of the German Air Force with the range development we would be assured that Holloman Air Force Base would not be on the list for closures in the near future. We also support the planned expansion of German Air Force training operations at Holloman Air Force Base, the development of a dedicated bombing range to support the German Air Force training and current and future US Air Force missions at Holloman Air Force Base.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Southwest Air Systems, Inc.
ADDRESS: PO Drawer 1968
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒ []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-29-97

I would like to go on record as supporting the expansion of the German Air Force training operations at HAFB and the development of a dedicated bombing range to support their training and current and future USAF missions at HAFB.

I also support the continued withdrawal of McGregor Range lands.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: MARTHA COX
ADDRESS: 2286 CAMINO DE SUENOS
CITY: ALAMOGORDO
STATE/ZIP CODE: NEW MEXICO 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☐ []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Martha Cox

RECEIVED JUL 24 1997

Draft Environmental Impact Statement
Expansion of German Air Force Operations
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/29/97

I WRITE IN STRONG SUPPORT OF
THE PLANNED EXPANSION OF HAFB TO
INCLUDE A NEW BOMBING RANGE ON
THE McFARLANE RANGE LANDS.

HAFB CONTINUES TO BE THE PRIMARY
SOURCE OF INCOME FOR MORE THAN 20,000
PEOPLE IN THE ALAMOGORDO AREA.

WITH A NEW ROUND OF BASE CLOSURES BEING
DISCUSSED BY CONGRESS/MILITARY, IT IS
IMPERATIVE THAT THE COMMUNITY STAYS
100% SUPPORT OF HAFB AND THE GERMAN

TRAINING OPERATIONS WHO WILL ALSO USE THE BOMBING
RANGE

NAME: SERGIO K. KING
ADDRESS: 2209 TUMBUKEO DR
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-3769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/29/97

I support the Air Force having there
a bombing range and I think it
would be a benefit to bring 30 German
I would aircraft to the base and 640
more personnel to be brought here to Holloman.

..... CONTINUE ON BACK FOR MORE SPACE

NAME: MARGARET WILSON
ADDRESS: 156 Desert Sands Rd
CITY: Alamogordo NM 88310
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-3769

1-29-77

NO, no German Air force on our
our territory.

Diane Fowler
Box 75
Quemado NM 87829

7-29-97

NO - to German Air force flying
over our territory.

Viola Orona
Box 75
Quemado NM 87829

Viola Orona
Box 75
Quemado, NM 87829

Mr. Sheriff K. Parker



1-29-77
NO - we don't want German Air force
flying over the territory.

Debbie Fowler
Box 342
Quemado NM 87829

7-29-97

NO to letting German Air force

Bernie Sanang
Quemado NM

Debbie Fowler!
Bernie Sanang
PO Box 342
Quemado, NM 87829

Mr. Sheriff K. Parker
HQ ACC/CEVA
1700 N. 1st St. +

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 7-29-97

PLEASE PRINT HAVING BEEN ON BOTH SIDES OF THE ISSUE
I will present my views to As a Pilot Flying Low
level in F-86's in France, Germany and neighboring
countries. I never saw animals stampede nor did
I ever notice animal flight while flying recon
in the Voodoo 101 in Great Britain, Scotland
etc.

2. For the past 6 years I have been involved
in ostrich farming - (The Spookiest Animal Alive)
Near Holloman AFB N.M. The first few times
over head flights frightened the birds - the only
thing that terrifies ostriches are hot air
balloons. I raised cattle prior to ostriches and
never saw any adverse effect on low flying
aircraft

3. Altitudes of under 500' should be avoided
over farms, herds of animals, etc.

4. I will always believe jet noise is the
sound of freedom lets continue to give
our aircrews the best training in the
world

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Charles H. Hartman
ADDRESS: 123 SAN PEDRO
CITY: ALAMOGORDO
STATE/ZIP CODE: NM - 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement: []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

*OK to German Tornado Flights
VR-N6*

Sheryl Parker

Winston, N.M.
87943



*Ms. Sheryl K. Parker
HQ ACCCEVA
129 Andrews St.
Suite 102
Langley Air Force Base VA
23665-2769*

Quemado, N.M.
7-30-99
Do when it may concern;

We do not want any
German Tornado flights on VR-176

Thank you
Joe E. Sedillo



Joe E. Sedillo
Po Box 115
Quemado N.M. 87129

Ms. Cheryl K. Parker

HQ. ACC/CEFA

129 Andrews Street Suite 1

23663/2763 23
129 Andrews Street Suite 1
P.O. Box 115
Quemado N.M. 87129
23665-279

NO German Tornado flights
on VR-176.

Cecil Muncy

NO! TO LOW Flying PLANES over
New Mexico. NO! German Flights
VR-176

Jackie Muncy

NO to German Tornado flights
VR-176

Shironda Muncy

NO to German Tornado
Flights VR-176

Michelle Lutton

NO
German Flights VR-176

Mary Livingston

NO
German Tornado
Flights VR-176

Verna Muncy

NO Low Flying planes over NM.
German Tornado Flights VR-176

Wanna Shelton

NO
VR-176
Flights

Robert C. Weed

NO!
German Flights VR-176

~~Patricia Livingston~~

NO
German Tornado
Flights VR-176

~~Ross~~
Livingston

NO!
German Flights VR-176

Rick Muncy

NO to German Tornado Flights
VR-176

Jeff Munn

NO!

We do not want German
Tornado flights on VR-176

They already blew out one of
our stock water storage tanks.
Wahoo Ranch

NO
German Tornado
Flights VR-176

John Smith

NO
Low Flying Planes over
New Mexico. NO German Tornado
Flights VR-176

William Smith

Dear Ms. Parker,

I am against the proposed use of low level German
Tornado training flights on the VR-176 flight path. I view
this as an outright sale of our peace and quiet and quality
of life to foreigners. If this expansion goes through, it
will have a very negative impact on people, livestock and
wildlife in this area.

Sincerely,

Robert W. Smith
Richard W. Smith

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/30/97

Low level flying (less than 1000') is obnoxious, annoying and dangerous. My husband and I are in the business of raising high quality quarter horses. The few jet jockeys we have now who chase to disobey current orders, are bad enough. Training the German cause severe stress to both breeding grounds and young offspring. We have called each time to complain and have not received the courtesy of an explanation. The late night flights could cause life threatening damage by sending livestock out to bed wild fire.

I doubt if any of the military hierarchy would consider flights at levels of 100'-500', acceptable over their homes - at any time of the day. If it is acceptable for any American citizen it should be acceptable for all - where do private rights stop? Let your pilots - German pilots buzz their own neighborhoods.

Will the government pay for the damage - stress they will the government pay for the damage - stress they

NAME: Julie White

ADDRESS: _____

CITY: Marta, TX

STATE/ZIP CODE: TX 79043-0178

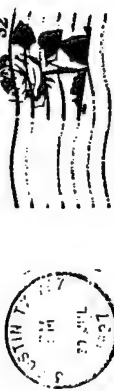
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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

cause in providy for the million dollars but
from Germany. To whom shall I send
my vet bills?

79043-0178



Air Combat Environmental Analysis Branch
HQ ACC/CEVA
Langley AFB, Va.

23665-2769

ATTN: Ms. Sheryl Parker

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: July 30, 1997

PLEASE PRINT

Please, please, do not bring in another German Air Force Wing, nor another bombing range. No more low level flights.

I have been a bookkeeper in Alamogordo for twenty-five years. The economy is the worst I have witnessed in all those years. People are out of jobs with no relief in sight. Rent is extremely high for locals as the German people have more money to spend on rent, and the prices have escalated.

Many people who have been lucky enough to find jobs are working for minimum wage, not enough to survive.

Low level flights over the ranchers land and the mesa will upset the wildlife and the livestock on the ranches. Cows under this type of duress will lose their calves.

The Chamber of Commerce here is trying to say the Air Force and German Air Force are adding greatly to our economy. They would not stand for it if they were being displaced or inconvenienced as this would do to the ranchers. The German Air Force has not helped our economy. The Chamber's figures are propaganda.

We need diversity. We need to save our land and ranches. Do these people not plan to eat any more? There are many desert regions in Nevada and Arizona near to Air Force bases where the German Air Force as well as our own could set up another bombing range without disturbing anyone. Let's look at this in a sensible way.

Again, I plead with you--Do not set up a bombing range where it will displace our ranchers and their livestock, the wildlife, and upset the environment. No more German Air Force (these people were once our enemies); no more low level flights.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Therence A. Roth
ADDRESS: PO Box 1828
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88310

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 7-30-97

PLEASE PRINT

I am completely opposed to this expansion

Damage to property

being used as target

training German

If the cold war is over and

the money for weapons of the

destruction - to pay off the

national debt. I feel this

whole thing is a joke-you

don't care what we think a

war - but I will continue to

oppose you at every chance

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: KAREN MILLS
ADDRESS: HC 31 Box 41
CITY: Carrizozo, N. M 88301
STATE/ZIP CODE: _____

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Please Hand This Form In or Mail To:

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: July 30, 1997

I am against the bringing in of more German Air Force. The establishment of a bombing range, and more low level flights in this area and over the ranchers land in New Mexico and West Texas. There are other areas. Many already established, where the Air Force activities can be carried out that are barren desert and with no danger of harming or displacing ranchers, their livestock wildlife, and the environment.

The people I sold my business to in 1993 are moving everything to Missoula, MT. as they felt the Chamber of Commerce here has interest only in the Air Force except for when the business people pay their dues. Then the Committee of Fifty and other chamber staff can travel to Washington, D.C. to again petition for their special interest, the Air Force. We need diversity, not more air force. And we sure don't need any more low level flights, nor a bombing range. There are many people out of jobs and the economy is at an all time low. The influx of Germans has not been a help to the mainstream of citizens in Alamogordo, and more would only hurt our ranching communities if you go ahead with any of this proposal. PLEASE DON'T!

I hear many of our OVN military and civil service people discussing this. They don't want it either but are afraid to say something. What kind of a democracy do we have any more anyway?

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: James J. Deila
ADDRESS: P.O. Box 1828
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-3769

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Comme M. Ande

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: July 30/1997

AS A MILITARY RETIREE OF SOME 27 YEARS OF SERVICE WITH THE U.S. AIR FORCE AND NOW FULLY RETIRED, I AM DEEPLY CONVINCED AS TO THE IMPORTANCE OF A NATIONAL DEFENSE IS GOING, IN PARTICULAR WITH OUR CLOSEST ALLIES SUCH AS GERMANY. MOST IMPORTANTLY THOSE WHO HAVE NEVER SERVED NOR FULLY UNDERSTAND THE NEED TO KEEP ALLIES SUCH AS GERMANY TRAINED AND ABLE TO ASSIST US WHEN THE CHAIRS ARE DOWN. I REQUESTED TWO THINGS IN MY GERMANY DURING THE "COLD WAR" AND CERTAINLY GAINED A DEEP APPRECIATION IN THE IMPORTANCE OF OUR RELATIONSHIPS. WE MUST CONTINUE TO MAINTAIN THAT CLOSE RELATIONSHIP BY TRAINING AS WE HAVE DONE FOR 40 YEARS THAT IT AM AWARD OF SIDE BY SIDE.

THE RELUCTANCE OF THOSE WHO CONTINUE TO OPPOSE THE USES FOR THE GERMAN AIR FORCE TRAINING OPERATIONS ASTOUNDS ME. I KNOW THAT THE ISLM IS A PANARCHY OPPONENT OF ESTABLISHMENT OF THE NEW RANGE. AS A TAX PAYER, I AM OUTRAGED THAT THE GOVERNMENT ORGANIZATION APPEARS TO BE SUPPORTING ENVIRONMENTAL GROUPS AND PERSONS EVEN THOUGH ADMIRATION. HIS MATTER EXTENDS WELL BEYOND THE ECONOMIC IMPACT THAT THE LOSS OF THE GERMAN AIR FORCE

.... CONTINUE ON BACK FOR MORE SPACE

NAME: FRANK S. GENTILE CRSGT (RET)
ADDRESS: 1301 DESERT EYE DRIVE
CITY: ALBUQUERQUE
STATE/ZIP CODE: NEW Mexico 88310-5504

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒ **X**

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA

ATTN: MRS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 22665-2769

TRAINING WOULD HAVE ON OUR COMMUNITY, STATE AND/OR COUNTRY, BUT DOES IN FACT IMPACT FUTURE RELATIONS BETWEEN OUR COUNTRIES.

I APOLOGIZE FOR HAVING TO WRITE THIS BUT TH WAS FORWARDED TO ME WHILE I AM ON A TRIP IN NORTHERN CALIFORNIA, APPROVE THE TRAINING RANGE!

Frank S. Gentile

July 30, 1997

Ms. Sheryl Parker
Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA
Langley Air Force Base, Virginia 23665-2769

Dear Ms. Parker:

I am writing as a property owner in Brewster County, Texas, to strongly protest the U.S. Air Force's proposal to fly sorties over West Texas at altitudes between 100 to 500 feet (whether by U.S. or foreign pilots). The proposal is connected to the multi-million dollar contract between German government and the U.S. government to train German pilots. My objection is based on the following points:

1. According to case law in Texas, a property owner owns 1,000 feet into the air above his/her property. Therefore, airplanes flying below 1,000 feet commit trespass. This point of law was acknowledged to be true and valid by the Air Force's legal representative at the public hearing in Alpine, July 7, 1997. That same legal representation also acknowledged that the legality of these flights over private lands had not been examined.
2. All lands in Texas over which sorties would be flown are private. This route covers flat, hilly, and mountainous terrain. The flights would originate out of Holloman A.F.B. in Alamogordo, New Mexico. New Mexico has hundreds of thousands of acres of federal lands that consist of flat, hilly, and mountainous terrain. If this is truly the training situation necessary for the pilots (whether U.S. or foreign), then training over federal lands is by far the more logical, legal, and fair choice.
3. West Texas' economic base is cattle/horse/goat raising, education, tourism, and the film industry. It is a rural area - not highly populated but far from empty and unvalued. Each ranch is a small business, with the means of production tied to the land. Low flying aircraft have been documented to have deleterious effects. At the Alpine hearing, property owners and Air Force officials admitted that there is no effective procedure in place for compensation due to injury to livestock, people, or property. (Prior examples cited included a herd of horses stampeded into a fence, causing them serious injury and the destruction of windmills due to turbulence from low flying aircraft.) This destruction of property will only increase in incidence should this proposal go forth.

Tourists come to West Texas to escape the noise and stress of the city. They will seek other destinations for relaxation if low flying jet airplanes fly sorties through our mountains and valleys.

Beginning with the movie "Giant" in the 1950's, the film industry has found West Texas to be an ideal location for television productions, movies, and commercials. One specific reason for filmmakers' attraction to the area is the lack of air traffic which destroys the authenticity of historical settings, as well as the planes' noise and visual distraction which makes filming impossible.

Low flying aircraft would seriously impact the economy of this area.

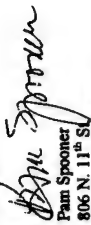
4. I will end by outlining the overwhelming reason for this proposal to exist at all. Air Force officials at the Alpine hearing volunteered that the proposed training sorties are already carried out in almost every other state, yet the Air Force is proposing to begin training German pilots by instituting a NEW training center at Holloman A.F.B. in Alamogordo. The German government is willing to pay several million dollars for this. To quote a participant in the Alpine hearing "This is a Chamber of Commerce deal." New Mexico gets lots of money and West Texas has to put up with the low flying jet planes. It's PORK for Alamogordo, pure and simple -- a way for this vulnerable Air Force base to

shore up its necessity should another round of base-closings occur. The Air Force will build new facilities at Holloman and hundreds of re-located support staff will spend their money in Alamogordo.

The points I have listed are not all the arguments that can be made against this proposal, but they are irrefutable ones based on law, logic, and fairness. The last point is based on cold, hard economics of the city of Alamogordo and the state of New Mexico. If that community should be granted the contract with the German government, then New Mexico should also enjoy the low flying jet planes -- not West Texans who have nothing to gain and much to lose. Our most valuable asset and attraction is the peace to be found in West Texas. This proposal would destroy that peace.

I ask fervently that this proposal not be put into effect.

Sincerely,


Pam Spooner
806 N. 11th St.
Alpine, Texas 79830

cc: Vice-President Al Gore
Sheila Widnall, Secretary of the Air Force
Governor George Bush
Attorney General Dan Morales
Senator Kay Bailey Hutchison
Senator Phil Gramm
Representative Pete Gallego
Representative Henry Bonilla
Rick Perry, Texas Agriculture Commissioner
Tom Copeland, Texas Film Commission
Doris Howdeshell, Director of Travel and Information, Texas Dept. of Transportation

NO!

German Tornado
Flights UR-176
over New Mexico

Branden Muncy

NO

German Tornado
Flights UR-176

Robert T. Muncy

I want to add that I would not want United States pilots doing this either. It is far too dangerous, no only to people, livestock, & wildlife, but to structures such as our homes & dams. The fact that they are TRAINING flights increases the danger. Our own air will be sacrificed. The people of Southwestern New Mexico should not be treated like Third World citizens.

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Beverly Manley
811 E Third #25
Truth or Consequences 87901

SAVE OUR PEACEFULL WAY OF LIFE!!!

NO !!! to VR-176

One of the proposed routes for the SUPERSONIC FLIGHTS which the German Air Force will be flying from Holloman Air Force Base is over the communities of MAGDALENA, DUSTY, WINSTON, HILLSBORO, KINGSTON AND MONTICELLO. We must respond to this proposal by AUG 4, 1997

PLEASE SIGN YOUR NAME to this petition or contact:

MS SHERYL PARKER HQ ACC-CEVA

129 ANDREWS STREET SUITE 102

LANGLEY AIR FORCE BASE VA 23665-2769

Pauline B. Parker, 5310 Rock Canyon Rd. E. B. M. 87936

Cheryl C. Parker, Monticello, N.M.

John C. Sullivan, Monticello, N.M.

John C. Sullivan, Monticello, N.M.

John C. Sullivan, Monticello, N.M.

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John C. Sullivan, Monticello, N.M.

John C. Sullivan, Monticello, N.M.

John C. Sullivan, Monticello, N.M.

162

97939
7301

LANGLEY AIR FORCE BASE

SAVE OUR PEACEFULL WAY OF LIFE!!!

NO !!! to VR-176

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129 ANDREWS STREET SUITE 102

LANGLEY AIR FORCE BASE VA 23665-2769

James W. Bannister HC 66 Box 110 Kingston NM 88042
 Anna Lindgren Hill HC 66 Box 100 Kingston NM 88042
 William A. Murrell HC 66 Box 113 Kingston NM 88042
 Deborah L. Lakin HC 66 Box 537 Kingston NM 88042
 Michael Hill HC 66 Box 120 Kingston NM 88042
 David W. Hubbard HC 66 Box 95 Hillsboro 88042
 Charles E. Duggan Box 121 Kingston NM
 Vivian M. Footman Kingston NM
 Barbara Box 121 Kingston NM
 Gene Box 99 Kingston NM

88042

SAVE OUR PEACEFULL WAY OF LIFE!!!

NO !!! to VR-176

Frank M. Pearce Jan 31 1997

One of the proposed routes for the SUPERSONIC FLIGHTS which the German Air Force will be flying from Holloman Air Force Base is over the communities of MAGDALENA, DUSTY, WINSTON, HILLSBORO, KINGSTON AND MONTICELLO. We must respond to this proposal by AUG 4, 1997

PLEASE SIGN YOUR NAME to this petition or contact:

MS SHERYL PARKER HQ ACC-CEVA
129 ANDREWS STREET SUITE 102
LANGLEY AIR FORCE BASE VA 23665-2769

Residence of Chelbridge, New Mex

Disputing NO for VR-176

Alfred White

Tom & Janet Pearce

HC 30 Box 120
Alamogordo, N.M. 87943

[illegible][illegible]

SAVE OUR PEACEFULL WAY OF LIFE!!!

NO !!! to VR-176

One of the proposed routes for the SUPERSONIC FLIGHTS which the German Air Force will be flying from Holloman Air Force Base is over the communities of MAGDALENA DUSTY, WINSTON, HILLSBORO, KINGSTON AND MONTICELLO. We must respond to this proposal by AUG 4, 1997

PLEASE SIGN YOUR NAME to this petition or contact:

MS SHERYL PARKER HQ ACC-CEVA

129 ANDREWS STREET SUITE 102

LANGLEY AIR FORCE BASE VA 23665-2769

Benard A Jones P.O. Box 55 Monticello, NM

Angela Cannon P.O. Box 55 Monticello, NM

John Farrow P.O. Box 55 Monticello, NM 87935

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Matt Meyers, M.P.H.

Matt Meyers
HC-66, Box 109
Hillsboro, N.M. 88042

P.O. Box 777
Columbus, NM 88029
31 July 1997

Dear Ms. Parker:

We have just read an article regarding the proposed low-level flight training program proposed for the German Air Force. In the article several people were quoted who had concerns for our biological and economic resources. These are important issues and they certainly should be addressed.

w-165

However we are writing to alert you to another resource of which you may not be aware. In this part of New Mexico we have a rich cultural heritage which extends back thousands of years. Of particular concern in regard to low-level aircraft are the prehistoric masonry structures which are roughly between 700 and 800 years old.

One example is the Gila Cliff Dwellings National Monument which is within the Gila National Forest, an area over which the proposed low-level flights will be conducted. The Gila Cliff Dwellings are only one of many masonry sites scattered throughout the state. As you can imagine, these sites are extremely fragile and have already suffered damage due to natural weathering as well as vandalism.

w-166

Studies have shown that vibrations from aircraft have tremendous adverse effects on such fragile resources. Low-level flights can exert as much damage in one pass as several years of visitors climbing over walls. Please contact land management agency archeologists while considering plans for low-level flights. These valuable cultural resources are truly irreplaceable.

Thank you for your consideration.
Respectfully,

Kaw, Mark Andrews
Mr. & Mrs Mark Andrews

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Paula Roul
Box 485
Hillsboro, NM 88042

HUGHES CATTLE CO.

BUSAN REYNOLDS HUGHES - President
DAVID D. HUGHES
JOHN R. HUGHES
LEORA REYNOLDS (1904-1984)
JOHN REYNOLDS (1882-1963)

RICHARD D. HUGHES - Gen. Mgr.
P.O. BOX 2118
FT. DAVIS, TEXAS 79734
(915) 428-3044
FAX (915) 428-3884

August 1, 1997

Ms Sheryl Parker
HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

I am writing to express my intense opposition to the training flights over West Texas by the German Air Force. In my opinion this is a property rights issue. The Federal Government owns vast quantities of land in the Western United States. We have been told that these lands cannot be utilized because they contain sensitive habitat for plants and animals. I suggest that the United States Air Force, the mightiest fighting force the world has ever known, not be held hostage to the U.S. Fish and Wildlife Service. Conduct your training flights over government owned land in the west and not over private property owned by patriotic, hard working, tax paying citizens.

Very truly yours,

Susan R. Hughes

Susan R. Hughes



"Fourth Generation Hereford Breeders"

Aubrey E. Lewis
Cloudcroft Area Sustainability Team (CAST),
PO Box 86, Mayhill, NM 88339

August 1, 1997

Ms. Sheryl Parker,
HQACC / CEVA,
129 Andrews St, #102
Langley AFB, VA 23665-2769

RE: Proposed Expansion of German Air Force Operations, at Holloman Air Force Base (HAFB), New Mexico

We support the "NO ACTION" ALTERNATIVE
ie: "German Air Force Training would continue at their current levels using existing aircraft, personnel, and facilities, at existing ranges."

Rationale:

- 1). Portions of the "Draft Environmental Impact Statement" (EIS) contain incomplete or inaccurate interpretations and assumptions, biased against the welfare of New Mexico citizens.
- 2). The USAF prefers more air space rather than the inconvenience of cooperating with the Army in scheduling air space already available.
- 3). The USAF prefers more new land rather than clean up an available, polluted New Mexico bombing range to enable construction of new targets

CAST seeks a desirable and sustainable future for Cloudcroft and the surrounding mountain area communities. Tourists and retirees seeking serenity and solitude are a primary future economic resource. Military expansion over our nations forests, parks, wilderness areas and community is counter-productive to our future economic growth and welfare.

New Mexico must choose the resources upon which to base our future. Further military expansion upon our public and private lands limits New Mexico's future economic possibilities. We have a long history of cooperation with the military. However, there appears to be no end to their New Mexico real estate appetite. If this expansion is approved the only tranquility to be found in the Land o Enchantment will be north of I-40.

Thank you,

Aubrey E. Lewis

Aubrey E. Lewis
Steering Committee

attachments: 2

Cloudcroft Area Sustainability Team
HAPE Environmental Impact Statement Concerns
Attachment - Page 1.

1). SOCIOECONOMIC - The EIS contains no impact considerations for the tourism/retirement industry. Tourist dollars are brought to New Mexico as a result of brief vacations leading to extended stays in mountain cabins, summer/winter and eventually retirement homes. The retirement income/savings, related construction, materials and services are new and permanent assets for New Mexico. The rising baby boomer retirees present an even brighter economic future.

W-168

The USAF wants more air space over "extensive areas" in four National Forests, seven Wilderness Areas and Five National Parks and Monuments. (EIS 3-29) A bland EIS observation states that "Many communities in southern New Mexico, particularly in mountainous areas, are popular for seasonal vacationing and as retirement destinations because of their natural and quiet settings." On the same page the EIS rationalization for flying over these areas: "Overflight of rural communities and structures is avoided by a minimum of 500 feet vertical and lateral distance." (EIS 3-32) This altitude was raised from 100 feet after strong public criticism. However, the "Maximum Sound Level" at 500 feet of an F-4 is 115 dB. (EIS 4-7) The "Threshold of Pain" is 120 dB. (University Physics, Addison Wesley Publishing Co., 57)

W-169

2). NOISE - The Environmental Protection Agency identifies 55 dB as "requisite to protect public health and welfare with an adequate margin of safety, it is commonly assumed that 55 dB should be adopted as a criterion for community noise analysis." (EIS C-14) To meet the EPA's "requisite to protect public health and welfare" most USAF and GAF aircraft should fly over 20,000 feet above the rural communities instead of the EIS prescribed 500 feet. Which is more important, an air force quibbling over inconvenient flight schedules in existing MTR's, or the economy, the welfare and decent consideration of some "isolated" New Mexico residents?

W-170

"Noise, often defined as unwanted sound, is one of the most common environmental issues associated with aircraft operations...Aircraft are not the only sources of noise in an urban or suburban surrounding, where interstate and local roadway traffic, rail, industrial, and neighborhood sources also intrude on the everyday quality of life....Whether that sound is interpreted as pleasant (for example, music) or unpleasant (for example aircraft noise) depends largely on the listener's current activity, past experience, and attitude toward the source of that sound." (EIS C.1.1)

The Cloudcroft area community is neither urban nor suburban. There are no interstates; our activity, experience and attitude is much different. We prefer the rustle of Aspen or Cottonwood leaves at 10 dB. That is why we are in this remote, uninhabited land and why suburbia comes here.

The EIS suggests the FAA, Federal Aviation Regulations as "the best means for determining noise impact in airport communities."
The Cloudcroft area community is not an airport community. The USAF is using the wrong yardstick!

W-171

Cloudcroft Area Sustainability Team
HAPE Environmental Impact Statement Concerns
Attachment - page 2.

However, having declared the FAA Regulations as the best, the USAF has totally ignored the following from the same document:

"The responsibility for determining the acceptable and permissible land uses and the relationship between specific properties and specific noise contours rests with the local authorities. FAA determinations under Part 150 are not intended to substitute federally determined land uses for those determined to be appropriate by local authorities in response to locally determined needs and values in achieving noise-compatible land uses."

W-172

Our "local authorities," the Otero County Commissioners were not on the mailing list to receive an EIS copy let alone invited to participate in the early on planning process. Who gave the USAF permission to claim two thirds of The Land of Enchantments air space for low level flying aircraft?

W-173

3). LAND USE - The USAF does not want to spend \$16 million to clean up an available New Mexico bombing range which the military polluted earlier. Live munitions in the available area must be cleared before new targets can be constructed. The USAF would prefer to pollute more of the state than clean up the mess they have already created.

"The area is characterized by large uninhabited areas with scattered, isolated towns, small communities, and homesteads...The primary land use outside the population centers is livestock grazing, with some forestry, agriculture, oil and gas exploration and extraction, tourism and recreational uses." (EIS 3.3) These statements are true. However, two of the four reasons given for the HAFB/German host selection were "The availability of a wide variety of terrain for training and the accessibility of Military Training Routes within close range of the base." Are large uninhabited areas with scattered, isolated towns, communities and homesteads just automatically available by USAF definition?

Who gave HAFB the idea that either the terrain or the air space was available? When HAFB acknowledged that "increased aircraft activity would result in elevated noise levels at isolated residences and recreation areas" did they think they were uninhabited, or just did not care?

W-174

4). AIRSPACE USE AND MANAGEMENT - The affected Military Training Routes (MTR) and Military Operations Areas (MOA) on pg. 3-28, dramatically demonstrate that approximately two thirds of New Mexico, virtually everything south of I-40, lies under or adjacent to these military training areas. The MTR's and MOA's are used for "the most demanding training activities ... conducted at low altitudes and high speeds" and for Air to Air combat training (commonly called dog fights).

W-175

The EIS General Findings (3.2.3), state the 91 noise level check points along the MTR's and MOA's for FY 95 compared to the projected baseline FY00 conditions range from 35 to 61 dB and 35 to 62 dB respectively.

What is not mentioned is that 45% (41) of the 91 reference points noise intensity levels will at least double. 32% will actually triple if the proposed action is approved by The Secretary of the Air Force in December 1997.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 8-1-97

I STRONGLY SUPPORT THE PLANNED EXPANSION OF GERMAN AIR FORCE TRAINING OPERATIONS AT HOLLAMAN AFB (GAFD). INCLUDING 30 ADDITIONAL F-16S TO BE BASED AT THE AFB. THE EXPANSION OF A GERMAN AIR FORCE BASE TO SUPPORT GERMAN AIR FORCE TRAINING AND CURRENT AND FUTURE USAF MISSIONS AT HOLLAMAN AFB IS A NECESSARY AND WELCOMED DEVELOPMENT OF THE REGION. THAT THE CONTINUED GROWTH AND EXPANSION OF HOLLAMAN AFB IS VITAL TO THE ECONOMY OF SOUTHWEST NEW MEXICO. THE ECONOMIC IMPACT OF SUCH A PROJECT IS OBVIOUS AND THE MILITARY ADVANTAGES ARE ALSO VERY IMPORTANT TO THE SECURITY OF THIS NATION.

I AM A MEMBER OF THE COMMUNITY AND I AM AWARE OF THE ECONOMIC IMPACT OF SUCH A PROJECT. I AM AWARE OF THE MILITARY ADVANTAGES AND THE ECONOMIC ADVANTAGES ARE ALSO VERY IMPORTANT TO THE SECURITY OF THIS NATION.

I AM A MEMBER OF THE COMMUNITY AND I AM AWARE OF THE ECONOMIC IMPACT OF SUCH A PROJECT. I AM AWARE OF THE MILITARY ADVANTAGES AND THE ECONOMIC ADVANTAGES ARE ALSO VERY IMPORTANT TO THE SECURITY OF THIS NATION.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: KEVIN MANNING
ADDRESS: 1905 S. VALLEY DR.
CITY: LAS VEGAS
STATE/ZIP CODE: NEVADA 89205

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
ATTN: MS. SHERYL PARKER
HQ ACC/CEVA
LANGLEY AIR FORCE BASE, VA 23065-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 8/1/97

Enclosed are copies of two separate air crashes between military and private aircraft. These tragedies will only increase if low altitude flying is increased and/or continued or commenced by German pilots in training over the small towns and private ranches in West Texas.

I was a speaker in attendance at the public hearing located in Alpine. It is my hope that your have been bombarded by citizens from all walks of life and professions in protest against these new and additional routes.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Gloria Evans (Evans' Ranch, Jeff Davis County, Tx.)
ADDRESS: 3700 Mockingbird
CITY: Midland, Tx.
STATE/ZIP CODE: Texas 79707

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☐

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
ATTN: MS. SHERYL PARKER
HQ ACC/CEVA
LANGLEY AIR FORCE BASE, VA 23065-2769

Navy filed required warning for A-6E flight

APR 16 1993
Crop-duster pilot didn't call FAA

By Jim Camden
and Margaret Taus
Staff writers

The U.S. Navy filed the required warnings for a warplane flying a low-level training mission over the Palouse marked military route on the Palouse on Wednesday.

But the pilot of a crop-duster that

collided with the Navy jet apparently didn't call the Federal Aviation Agency to check for the warning, the agency said Thursday.

Other crop-dusters said that's not a surprise, because they rarely call for the Navy notices. The pilots said they don't have time, and said the military should watch out for them.

"When the wind goes down or the rain quits or the wind switches, you've got to go right now," said Myron Forstrom, a pilot and co-owner of Southeastern Aviation Inc.,

■ Airspace can get crowded - A15
■ Rescuers feared the worst - A15

in Colfax. "Sometimes we wait all day just to get one or two loads done."

As investigators sifted through the wreckage of the A-6E Intruder and the Grumman Ag-Cat biplane, the Navy suspended training flights on the route.

The one-way flight corridor from a military bombing range in Boardman, Ore., to Steptoe Butte will

remain closed until further notice, said Howard Thomas, a spokesman for the Whidbey Naval Air Station, where the jet was based.

If the route reopens, it will revive a clash over airspace between the pilots of crop-dusters and those of military jets. Both claim rights to an increasingly crowded Palouse air corridor.

Palouse residents say they have complained for years about near-collisions and military jets that fly too low.

Please see CRASH A14

continued →

Crash

APR 16 1993
Navy jet and crop-duster collided, killing pilot. The crash occurred on Wednesday, April 15, 1993, at approximately 10:30 a.m. near the town of Colfax, Idaho. The Navy jet was an A-6E Intruder, and the crop-duster was a Grumman Ag-Cat biplane. The pilot of the crop-duster, Myron Forstrom, was killed.

Crop-duster Keith Graham of Hoacabate, Idaho, remained in critical condition Thursday at Hoacabate Medical Center. Navy pilot Lt. Daniel Dugan, 31, was released from Sacred Heart for a broken arm. Bomber-crewman Capt. James Jacobs, 44, was in stable condition at Fairchild Air Force Base hospital.

The accident was the first mid-air collision involving a Whidbey jet and a civilian plane. The base has lost 14 of the 130 million Intruders and 10 of the 10 years.

Reports on Wednesday's collision might not be available for a month. Military fighter jets typically fly between 250 to 1,000 feet off the ground, at speeds of about 425 mph when they practice maneuvers designed to slip under enemy radar.

The altitude and speed of the planes involved in Wednesday's crash have not been released. After the collision, the Navy crew ejected and the planes fell into the rolling wheat fields north of Diamond. The impact of the A-6E left a hole more than 10 feet wide, and a cone of debris spreading out for about 100 yards, the witness said. The crop-duster fell to earth about 100 yards away. Graham was on board when it crashed.

set up Thursday about three-fourths of a mile from the jet wreckage. Access to the crater, hidden behind a hill, was restricted. Black chunks of debris lay scattered on several adjacent fields.

The areas around the planes were roped off to protect the sites for investigators from the Navy and the National Transportation Safety Board, which investigates accidents of civilian airplanes. Each agency will prepare its own report.

The crash sites will remain closed until the wreckage is removed, Thomas said.

The Navy plane may have been carrying "dummy" bombs, but did not have any explosives, he said. The crop-duster left the Colfax airport about 10 minutes before the collision to spray a mixture of herbicides to a field. The tanks on the single-engine biplane were full when the collision occurred.

A spokesman for the state Department of Ecology said the spilled

herbicide probably did not present an immediate danger.

Under military and FAA rules, the Navy must notify the FAA at least two hours before their planes use the training route. The agency then notifies all flight service stations in the region, which tell any pilot who calls when the jets will be in the area. The FAA lists a half-hour "window" in which the plane might be passing through, and approximate altitudes.

The Navy complied with that rule Wednesday, and flight service stations had the information available, FAA spokesman Dick Meyer said.

"The flight service stations in Spokane did not talk to this crop-duster yesterday," Meyer said after the agency checked its records. Linda Fender, who co-owns Fender Air Service and the airplane that crashed Wednesday, said spray pilots should not have to call.

"This is where we live and do our business every day," said Fender,

whose husband Darrell also flies a crop duster.

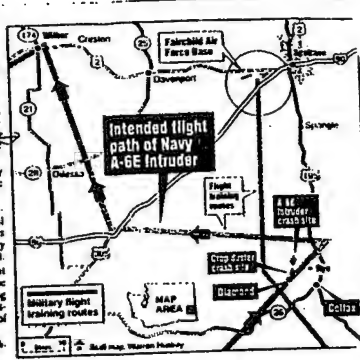
Military planes have the right of way inside the corridor, Meyer said.

But agricultural pilots say the jets must look out for other aircraft, especially during crop-dusting season. Crop dusters simply can't maneuver fast enough to avoid a jet, said David Schoepfle of Dale's Flying Service.

"By the time a jet is the size of a fly on your windshield, you're dead," he said.

Sandy Forstrom, executive secretary of the Pacific Northwest Aerial Applicators Alliance, said she wants the group to meet with military officials to prevent a similar accident.

"What we're going to ask for is that we know their flight patterns and the approximate time they'll be coming through," said Forstrom, whose husband pilots a crop duster out of Colfax.



2 pulled pilot out of plane

Rescuer was afraid
aviator was dead

By Eric Sorensen
Staff Writer

Alex McGregor and Steve Watts expected the worst when they came across the crumpled wreckage of a crop-duster that collided with a Navy jet Wednesday.

After speeding six miles to the scene from their office near the Palouse fairgrounds, Watts recognized the plane as one flown by Darryl Fender, owner of a Colfax air service and a longtime friend.

"I was afraid he was dead," Watts said Thursday.

And after running across a muddy field to the wreck, what they found was almost as bad.

In what was left of the cockpit they found a pilot unconscious and hanging upside down in his harness. His feet were tangled in the rudder pedals. He was gurgling and struggling to breathe. His face was so bloody Watts had to later pull out his wallet to identify him as Keith Graham, 40, of Homedale, Idaho.

Graham remained in critical condition Thursday at Deaconess Medical Center.

A carpenter in the off-season, the father of two had been spraying three to five months a year for the Fender Air Service since the mid-1980s.

Because he was flying as a subcontractor and not a Fender employee, Graham is not covered by workers' compensation. Because he also has no private health insurance, the McGregor Company has set up the Keith Graham Emergency Fund to help him meet medical expenses.

Contributions can be sent in care of The McGregor Company, P.O. Box 740, Colfax, WA 99111.

"He's going to need lots of help," McGregor said Thursday.

2nd half of 4-16-93
p. A 15:1
story

"He's going to need lots of help," McGregor said Thursday.

McGregor is president of his family's Colfax-based agricultural chemical company, Whitman County's largest private employer. He and Watts, the company vice president, were meeting in his office when they saw plumes of smoke from the Grumman Ag-Cat and the Navy A-6E Intruder.

Riding in Watt's pickup truck, the two were looking for the Navy jet when they came across Graham's plane about 200 yards off Slupe Road about two miles from Diamond.

Judging from Graham's paperwork, Watts later figured the pilot was making the last run of the day, heading northwest with a load of herbicide from the Whitman County airport.

On board were the chemicals Senecor and Igran, weed killers used for cheatgrass and broadleaf weeds in winter wheat. The U.S. Environmental Protection Agency says the two chemicals can be irritating to the eyes, skin and respiratory tract, but are toxic only if ingested in large amounts.

Watts said he and McGregor figured as much, since farmers are spraying only with herbicides and fertilizers at this time of year.

A greater concern at the time was whether the plane might burst into flames.

From one side of the wreckage, Watts freed Graham's feet. McGregor freed his upper body from the other side. When they both lifted him clear of the plane, he began to breathe more easily but remained unresponsive.

McGregor ran to within shouting distance of several farmers on the roadway and yelled to get an ambulance. Then he and Watts waited nervously for emergency workers and a Heartlife helicopter to the Deaconess Medical Center.

"You could watch him breathing and his condition looked so tough," McGregor said. "You kept glancing over and hoped he kept fighting. He was courageous in fighting this and you hope he hangs in there."

Neither pilot faulted for midair collision

APR 2 1994

Keith Graham

but is recovering.

The two Navy pilots suffered minor injuries when they parachuted out of the A-6E Intruder before it went up in flames. The Ag-Cat also was destroyed.

The board's report may affect whether the Navy decides to pay the uninsured Graham's \$300,000 in medical bills.

Earlier Navy and Federal Aviation Administration investigations tended to put more fault for the collision on the Navy jet, which was flying five times as fast as the spray plane.

The Navy said it is waiting for all the reports before deciding about Graham's medical bills.

The Navy has compensated Fender Air Service for the plane Graham was flying.

A series of public meetings was scheduled with state and federal officials and members of Whitman County's agricultural community after the crash.

Whidbey Island officials have made some changes to make the airspace over the Palouse safer.

Pilots can call a toll-free number to find out if Navy jets are in the area. The jets also are flying a little more slowly and a little higher.

PULLMAN — A National Transportation Safety Board investigation of a midair collision between a Navy jet and an aerial spray plane last year faults neither pilot for the crash, a spokesman said Friday.

The board ruled the probable cause of the crash was the "inherent limitations of the see-and-avoid" practice of flying.

"We tend not to assign blame at all," board spokesman Alan Pollock told The Moscow-Pullman Daily News.

The board found that the two pilots, flying their planes under visual flight rules requiring them to watch for hazards, didn't see the crash coming.

"It's not always possible to avoid something you collide with," Pollock said.

Crop-duster Keith Graham was on his way to spray a field in a Grumman Ag-Cat, and the Navy A-6E was returning to Whidbey Island Naval Air Station when they collided April 14, 1993, near Diamond, eight miles west of Colfax.

Graham suffered serious injuries

Crop-dusters, jets jockey for Palouse airspace

By Kelly McBride
Staff writer

Close encounters between crop-dusters and Navy jets are not uncommon near Steptoe Butte.

Gene Marple, of Garfield, was banking off the butte last year when an A-6E Intruder passed beneath him.

"I could look down and see into their cockpit," he said.

Mike Proff, of Rosalia, has had so many close calls he can't count them.

"Your heart quits, and adrenaline moves, and you see the first one and you don't know where the second

one's at," he said.

A year ago Marple, 66, was spraying a field south of Steptoe Butte, near where Wednesday's collision occurred.

As he turned his plane to make another pass at the field, he noticed the A-6E Intruder approaching.

"I looked out and here he come from about a half a block away," Marple recalled. "I was about 50 feet off the turn and then he was right below me."

Marple suspended his plane in midair for the split second that it took for the Intruder to pass between him and the field he was spraying. The jet, which approached from the

southwest, peeled around the butte and headed off toward the northwest.

Marple plunged back toward his field through the wake of the jet.

"I tried to get down under the vortexes, but they were rocking me back and forth," he said. "I dove the airplane (toward) the ground. I got about 15-20 feet off the ground when I got out of it."

After recovering, Marple said his partner, who was flying nearby, told him a second jet had flown around the butte at a higher altitude.

"I know they never even saw me," Marple said. "Another three seconds and he would have killed me. If I hadn't had 41 years of flying under my

belly, he would have killed me."

In the spring, when crop-dusting lasts from dawn until dusk, there is no time to plan around the Navy, Marple said.

He didn't even take the rest of the day off after his close call at Steptoe Butte.

"I settled down for a cigarette and cup of coffee to calm my nerves, then I got back in the plane," he said.

Other pilots have similar stories.

"It's been going on out here for 15 years," said Myron Forstrom, co-owner of Southeastern Aviation Inc. in Colfax. "I'm surprised it hasn't happened before."

Staff writer Margaret Taus contributed to this report.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: Aug 1, 1997

I strongly support the planned expansion of German Air Force training operations at Holloman AFB, the development of a dedicated bombing range to support German AF training and USAF missions, and the continued withdrawal of Mc Gregor Range lands. This will not just be for the German AF. It will be used by the USAF and ensure Holloman AFB continued existence. The BLM is against this project but they have done nothing to contribute to the economy of Otero County or Alamosa. The total economic impact of HAFB is estimated at over \$400 million to Otero County. The economic impact of the German Air Force on Otero County is currently estimated at \$17 million a year. Otero County and Alamosa need the continued existence of the military. The more expansion allowed, the better the chances of continuing to be here, and that means continued economic benefit.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Thomas Greer
ADDRESS: 3123 Sunset Ave
CITY: Alamosa
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2796

August 1, 1997

Ms. Sheryl K. Parker

HQ ACC/CEVA

129 Andrews St., (102)

Langley Air Force Base, VA

23665-2796

Ms. Parker:

I recently read an article about the proposed low-level flight plan for the German pilots. I am a resident of Socorro County, more specifically, the Village of Magdalena. I am strongly opposed to this plan. Low-level flights on route VR 176 would cause excessive noise and disturbance.

Though this is a rural area with a relatively low human population density, there are other factors to be considered. The noise would have a negative impact on the wildlife in the area. Much of the area is ranch land and livestock would also be impacted.

I think the U.S. Air Force needs to reconsider this plan. Perhaps the German pilots could perform their low-level test flights in.....Germany? What an idea!

BTAP
Kim Tafoya

Box 980

Magdalena, NM 87825

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Leonardo T. Rivera

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Walter Henders

(include address)

Box 170
Winston NM 87943

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Leanne Henderson
PO BOX 170
Winston, NM 87443
(include address)

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Leticia Lott
I am misplaced white sand ranch
Ranch ~~that~~ taken 1941. This was our
Heritage (father - grand father have
homestead land) should have
been our children's heritage - he
gave the german should not be
here. But it's tragedy must be - first
them use White Sand Miss. I Range

Arden Lewis
P.O. Box 144
Pinon, NM 88344

AIR COMBAT COMMAND ENVIROMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Dear Ms. Parker,

This letter is in response to the DEIS on the Proposed Expansion of the German Air Force operations at Holloman Air Force Base, New Mexico.

After a short study of the DEIS, I found a couple of mistakes. The DEIS states that the West Otero Mesa Alternative NTC site drains in an easterly direction to a small subwatershed (Shiloh Draw) tributary to Sacramento Creek downstream of the water source. There is no way this can be correct because Shiloh Draw is several miles south of where the Sacramento Creek watershed ends.

The DEIS also states that the Prather Ranch well will produce 600 g.p.m. Is this the John Prather Ranch well? This is the only Prather Ranch on McGregor range. this well will not produce 600 g.p.m.. It might pump 20 g.p.m., and that is a strong MIGHT!

This is only a couple of things that are wrong. If these are wrong then how many other things are also wrong?

I would like to comment on Otero County Road 506. I don't see anywhere the DEIS addresses this issue. Road 506 is the only link the ranchers in the southern part of Otero County have to Alamogordo, which is where the County seat is located. Has anyone considered the imposition this place on the ranchers? Evidently you have not! How many more hours will this cause 506 to be closed? How much more traffic will this place on this road? Is the German Air Force or the U S Army going to help pay for the upkeep on this road?

It appears the West Otero Mesa site was chosen and then the EIS was written to fit the location. The United States military already has target complexes on WSMR, Red Rio, Oscura, McGregor Range, and one on the Melrose range. Why should the contamination of this much more land be allowed or even needed?

I am in favor of the "No Action Alternative". I know the defense budget has been reduced in the past few years. This is not my fault. However, I have to live within my budget limits. Maybe you should consider doing the same!

At any rate, the comment period needs to be extended!

Sincerely,

Arden Lewis

P.O. Box 221
Williamsburg, NM 87942
July 31, 1997

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: _____

SEE ATTACHED

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street - Suite 102
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

These comments are in reference to the "Proposed Expansion of German Air Force Operations at Holloman Air Force Base, New Mexico".

I recognize the "attempts" shown in the DEIS to represent the effects of environmental noise. In spite of those attempts and even though the methodology is "agreed on..." for environmental impact analysis documents" (App.C-3) there are factors of a subjective nature that are pertinent to the analysis that have been inadequately addressed.

Results of surveys or studies of populations in urban centers and especially near large airports and military bases regarding "annoyance" thresholds cannot be correlated accurately to populations that are not habituated to high ambient noise levels.

Additionally, the annoyance of aircraft noise is much greater when it intrudes upon activities that have a desirable or expected component of peace, quiet or tranquillity. Simply put, few people would object to the sound of aircraft if they knew they were standing at the end of a runway and most people will be annoyed if they are hunting, fishing or hiking when an aircraft unexpectedly flies over them at a low altitude, going more than 500 mph.

The cumulative effects of all the various national and foreign aircraft utilizing the airspace in the area of Truth or Consequences, whatever their WTR or other designation, currently results in virtually continuous aircraft noise on some days, which is very annoying, even if there are no overflights the next day. (If a neighbor only steals from you one day a week, do you consider him a good neighbor?)

There is no recourse available to citizens disturbed by low-flying aircraft or sonic booms - no one to call or to complain to. The sudden onset precludes obtaining numbers, insignia, etc. and if the incident occurs during a day-flight after dark, nothing can be seen to report.

*****CONTINUE ON BACK FOR MORE SPACE *****

NAME: F.A. Williams
ADDRESS: Box 221
CITY: Williamsburg
STATE/ZIP CODE: NEW MEXICO 87942

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Which brings up the question of whether the Air Force is being disingenuous or not. It would seem so, based on:

- 1) calling flights up until 10:00 pm "day flights";
- 2) over 150 acronyms, eight appearing on the first page alone;
- 3) the misleading nature of many maps, ie. Figure 4.2-3. The average person would not be able to identify what town the reference points were near. I was unable to find in the text a definition of "sensitive receptors" as shown in the legend;
- 4) characterizing points 51 and 52 on Table 4.2-4, 4.2-8 and 4.2-12 as "outside region of aircraft noise" is simply not true, as was mentioned over and over at the public hearing in Truth or Consequences;
- 5) not making clear the locations and widths of MTR corridors on easily-understood maps.

In regard to flights over Elephant Butte Lake, Caballo Lake and the Rio Grande River between them, no discussion of the impacts to the rural, isolated ambience is found in the DEIS. This is one of the qualities negatively impacted by aircraft over-flights, especially if they are of the low-altitude type.

No mention is made specifically of the Caballo and Elephant Butte Lakes, which are under portions of VR-176. Large numbers of water fowl and shore birds are found on these lakes. No analysis of the impact of low-altitude flights on them is offered. Nor is any mitigation effort mentioned.

I do not support the proposed action due to its obvious negative impacts to wildlife and human life below VR-176, and by inference, probably under other areas impacted by increased over-flights. The DEIS notes (3-32), that many communities are popular BECAUSE of their natural and quiet setting.

A toll-free hotline should be established so citizens may make their displeasure and annoyance known to officials and so that appropriate disciplinary action may be taken for infractions of air space regulations. A detailed accounting including date, time and location of incident and actions taken should be made available to the public.

So that I may continue to learn about the proposed action, please provide me with the following documents, publications or correspondence referred to in the DEIS:

- copies of government to government correspondence with Indian tribes and reservations, as mentioned on page 3-94.

- U.S. Air Force, 1991. Environmental Impact Statement: Beddown of the 37th Tactical Fighter Wing at Holloman AFB.
 - U.S. Air Force, 1993. Proposed Beddown of the German Air Force PA-200 and an Additional AT-38 Training Unit at Holloman Air Force Base, New Mexico.
 - U.S. Air Force, 1996. Draft Environmental Assessment of Proposed Airspace Modifications to Support Units at Holloman AFB, New Mexico.
 - U.S. Department of Defense, 1996a. Flight Information Publication AP/1B, Area Planning, Military Training Routes. North and South America. August and December.
 - U.S. Department of Defense, 1996b. IFR Enroute Low Altitude. November.
 - U.S. DOI, 1995. Report on the Effects of Aircraft Overflights on the National Park System. National Park Service. July.
 - U.S. Forest Service, 1992. Potential Impacts of Aircraft Overflights of National Forest System Wilderness.
 - Copies of all "Personal Communications" listed on pages 6-15 through 6-18 of the DEIS.
- I wholly support the no-action alternative.

Sincerely,


F. A. Williams
Concerned Citizen

*Draft Environmental Impact Statement
Expansion of German Air Force Operations
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

DATE: 8/4/87

Thank you for your input.

PLEASE PRINT

I support this.

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Mr & Mrs Neil Stromberg
Box 302
Williamsburg N.M.
87942

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JIM Tschwin
ADDRESS: 583 E. 4th St.
CITY: Alamogordo
STATE/ZIP CODE: N.M. 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA

ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: _____

I SUPPORT THE HOLLAMAN
AFB DEDICATED BOMBING RANGE

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

*Atty & daughter
John & Karen*

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME:

ADDRESS:

CITY:

STATE/ZIP CODE:

*John & Karen
24131 Deseret Hills Dr
Alamosordo, NM
88310*

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Mr. G. W. G. G.
P.O. Box 142
Torrance, CA
90501

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Gene H. G. G.
P.O. Box 341
Bottle, NM
(include address) 8793

*It has already had a negative impact
Plans for our house is gone. I want
children & they do not fly at designated
heights.
It is so close to the house that
Fartles.*

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Savanna F. Oysterday
July 30, 1997.

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Ernie Lee Henderson
P.O. Box 83 Ruston, LA
Winston NM 87943
(include address)

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

L. W. J. Kuhl
PO Box 402
Hillsboro, NM 88042

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

L. W. J. Kuhl

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Herat L. Welby
P.O. Box 88
Windsor, N.M. 87943
(include address)

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Diana M. Rivera

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 22 July 97

Thank you for your input.

PLEASE PRINT

I fully support the planned expansion and know of the impact it could have on our economy.

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 7-17-97

Thank you for your input.

PLEASE PRINT

I strongly support the planned expansion of the German Air Force + training operations at Holloman AFB. Also, the dedication of a bombing range is much needed, not only for the German Air Force, but also for Holloman Air Force Base, White Sands Missile Range and other military exercises which use the Otero Mesa Area. McGregor Range.

I realize that comments are flooding your office and appreciate your time in careful consideration to this most urgent matter.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JANICE E JETER
ADDRESS: 1604 CRESCENT DR
CITY: ALAMOGORDO
STATE/ZIP CODE: NEW MEXICO 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ()

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Todd Staley (w/er. Private Time Sports)
ADDRESS: 3199 N. Whitesands Blvd Ste A-9
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. (X)

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HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

THE RURAL ALLIANCE FOR MILITARY ACCOUNTABILITY

CO-DIRECTOR
Marla Pinner



CO-DIRECTOR
Juan Montes

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(505) 586-1241
Phone/Fax

P.O. Box 60036
Reno, Nevada 89506
Field Operations
Phone/Fax (702) 677-7001
(702) 786-0180

Thursday, July 25, 1996

U.S. Air Force
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

Dear Ms. Parker,

The following are the comments by Rural Alliance for Military Accountability (RAMA) on the Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico to allow German Tornado aircraft to conduct military training exercises there.

The U.S. Air Force (USAF) has again demonstrated its arrogance by pursuing a bombing range on Otera Mesa despite the public controversy surrounding the proposal. In short, the USAF has ignored substantial opposition to the proposal. RAMA joins the U.S. Bureau of Land Management, the Otera County government, and area ranchers, sporting interests and environmentalists in their long-standing position that Otera Mesa and the Mountain Footfalls portions of the McGregor Range should not be re-withdrawn upon expiration in 2001. This would ensure continued public access and protection of these environmentally-sensitive resources.

Otera Mesa supports crucial public uses, both commercial and non-commercial. A bombing range on Otera Mesa would clearly restrict public access and utilization. Instead the USAF, together with other branches of the military must better coordinate use and share existing bombing ranges and airspace.

The combined military activities associated with Roving Sands, operations at White Sands Missile Range, the Theatre Missile Defense Project, and Related Actions at Cannon AFB are having a cumulative negative impact on the natural resources and quality of life in New Mexico and Texas.

The DEIS fails to adequately describe the proposed action. With the proposed use of not only the German Tornado, but the F-117, F-16, F-15, F-4, A-10, HH-60, HH-53, B-1, B-2, B-52 and other aircraft in DOD inventory plus foreign national aircraft operating with DOD sponsorship, it is clear that the USAF is attempting to establish an international training center in New Mexico.

MANAGEMENT BOARD
MAKORI MCCLAIN Savannah, GA
MARGENE MIDGE Ukiah, CA
GARY SCHWARTZ New York, NY
JODI SCHWARTZ San Francisco, CA
LORENZO VALDEZ Espanola, NM
C.F.W. WHEELLOCK Orono, WI

RAMA is a project of the Tides Foundation

Printed on Recycled Paper

But in the opinion of RAMA, the main failing of the DEIS is that it fails to note that the reason the German military is so interested in conducting maneuvers in the U.S.: The German government has banned low-level military training maneuvers under 1,000 feet Above Ground Level. This ban was imposed following several jet fighter crashes and publication of an adverse government report.

The Federal Health Office in Berlin, Germany conducted a study into the long-term health effects from the noise of low-flying military jets. The report, conducted in Area 7, a low-flying area around Hesselberg in Bavaria, Germany, considered the physical and emotional effects of such noise on children, and found that it can damage a child's immune system, which helps fight off illness and disease.

Children in Area 7 were also found more often to be hard of hearing, to suffer from upsets of the motor nerves, to feel frightened or anxious, and to be bedwetters. They also tended to suffer more often from mumps and measles. The children tended to have more difficulty going to sleep, and when they did sleep, to experience nightmares. Other health effects include loss of hearing, high blood pressure and behavioral disturbances. Girls and boys up to the age of four and girls in general are most likely to be affected, the report said.

The DEIS notes on page 4-40 that noise levels over privately owned lands east of the McGregor Range are incompatible with residential land use and that aircraft maneuvering may increase the potential for overflight of Timberon. What mitigation measures will be implemented? Will peoples home be provided with sound proofing? Will the Air Force be taking actions to condemn these homes in the future?

RAMA does not accept the premise that "dilution is the solution to pollution" of impacts associated with military airspace. That notion rings of a post-facto justification for the military's insatiable appetite to garner significant new amounts of airspace while refusing to surrender any airspace designations associated with base closures. Indeed, our experience has been that any proposed airspace acquisition by the Defense Department (DOD) - once granted - becomes permanent. As opposed to military land withdrawals, Special Use Airspace (SUA) and Military Training Route (MTR) designations do not have sunset clauses. Moreover, changes in airspace use, including dramatically-increased operations, often occur without public notification or involvement.

Contrary to the Pentagon's solution to impacts of military airspace, our belief is that the best way to avoid them is to decline to designate the use of airspace for military purposes.

Today, the DOD is the only federal agency which does not provide the public with the opportunity to comment on draft Environmental Assessments (EAs). For decades, this deprecation of the process under the National Environmental Protection Act (NEPA) has allowed the U.S. Air Force (USAF) to create new Military Operation Areas (MOAs) and MTRs, and to withdraw public lands without public input or notification. We believe it is time the Pentagon allow full public participation in the decisions that impact our environment and thus our lives.

RAMA would also like to take the opportunity afforded through the DEIS process to again formally request grassroots representation on the Interagency Working Group for Special Use Airspace. Sheri Wasserman Goodman, Deputy Under Secretary of Defense (Environmental Security) pledged such grassroots participation before the House Natural Resources Committee on June 17, 1994. It has yet to occur. We consider any further refusal to honor this request as a this breach of trust and a true indicator of the closed door attitude which the DOD has towards airspace matters.

RAMA opposes any expansion or designation of land and/or airspace to the military until completion of a National Needs Assessment. For such as assessment to truly measure all direct and indirect impacts of these designations, it must involve all branches of the DOD, as well as the Department of Interior, the Department of Agriculture (USFS and NRCs), the Federal Aviation Administration, the General Accounting Office, appropriate state and local governments, and Congress. It is crucial that a strategy for strong public participation - including that of Native American tribes - be developed and implemented. Upon completion, the National Needs Assessment should be released for public comment and review and a series of public hearings held across the nation.

The reasons for a national needs assessment are clear. Without it, the military will continue to acquire land and airspace in a piecemeal fashion without either a single, defined blueprint justifying those expansions, or congressional oversight of that blueprint. Without a national needs assessment, the military will duplicate existing training capabilities located on the 25 million acres which the DOD already controls. Without a national needs assessment, the DOD can quietly expand upon the 50% of our nation's airspace that it already has.

The DEIS states on page 2-31 that a proposal under consideration, EA of Proposed Airspace Modifications to Support Units at Holloman Air Force Base, NM. CEQ regulations clearly state that connected actions should be discussed in the same environmental impact statement (40 CFR 1508.25(a)(1)). Since this airspace would be "used under the proposed action the two cannot be illegally disconnected. Additional relevant CEQ regulations include: 40 CFR 1502.4(a) Proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement; 40 CFR 1508.25(a)(2) Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement; 40 CFR 1508.25(a)(3) Similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography. An agency may wish to analyze these actions in the same impact statement. It should do so when the best way to assess adequately the combined impacts of similar actions or reasonable alternatives to such actions is to treat them in a single impact statement. The DEIS states in Section 1.2 that the purpose in the international arena the purpose of the action is to further support a bilateral agreement between the governments of the U.S. and Germany first proposed in 1990 and implemented in 1996 with the location of 12 Tornadoes at Holloman AFB. Therefore, all actions connected with this agreement must be considered a single action.

RAMA is aware that every western state faces military expansion or renewals, and we believe that these activities are having significant immediate and cumulative environmental impacts. Among the plans currently under consideration:

- The Yuma Training Complex has proposed to "develop new target simulations" and "develop additional transmitter-telemetry facilities."
- The Marine Corps Air Station has proposed to upgrade their Tactical Air Combat Training System within the Barry Goldwater Range. The range will also be home to a new Measurement and Debriefing System.
- The National Guard has proposed a Colorado Airspace Initiative with "simulated target, surface to air threats, and simulated weapons delivery tactics."
- In Nevada, Nellis Air Force Base has proposed "Nellis Air Combat Training System Sites."
- Twenty seven additional EW and TACTS sites and one master site are proposed at Naval Air Station (NAS) Fallon, Nevada. * In New Mexico, the USAF has proposed a new bombing Range for German Aircraft Operations at Holloman AFB.
- The Air Force has proposed doubling the size of the Lucin A & B MOAs at the Utah Test and Training Range (UTTR)
- As described in the Special Nevada Report, NAS Fallon has proposed three new MOAs. The 10,000 square mile expansion anticipated by this proposal would double the size of the Navy's current airspace designations.
- NAS Fallon has also proposed a 123,000 acre withdrawal of public lands, known as the Master Land Withdrawal.
- Cannon Air Force Base in New Mexico has requested "Proposed Structure Changes and Related Actions."

In addition, recently-approved proposals affecting military land- and airspace uses include:

- The 99th Electronic Combat Range at the UTTR;
- Roving Sands in New Mexico;
- The Theatre Missile Defense Project in New Mexico;
- The expansion of military activities at the White Sands Missile Range;
- The deployment of German Air Force Tornados at Holloman Air Force Base in New Mexico; and
- Linkage of the electronic warfare systems of Fallon NAS and Nellis AFB.

In February 1993, then-Chairman of the Joint Chiefs of Staff General Colin Powell acknowledged that, "An integrated test and evaluation range structure linking existing ranges across six western states and supersonic areas off the California coast would provide a land, airspace [and] sea area to accommodate a large portion of our joint training, test and evaluation needs well into the next century." Current expansion plans in the West, while conducted on a piecemeal basis, clearly demonstrate the DOD's effort to implement this consolidation. As such, the DOD's failure to prepare a Programmatic EIS which assesses overall needs for training and cumulative impacts of the training range expansions in the west violates the spirit and letter of NEPA.

Chaff and Flares

Chaff is an airborne radar-detection countermeasure consisting of extremely fine fibers of aluminum coated fiberglass. A typical chaff bundle contains approximately 2.1 million fiberglass strands which are the size of human hairs. After its dispersal during military training exercises, it turns into a waste material that falls to the ground.

UJ-195 The DEIS notes on page 2-40 that chaff would be dispensed on about half of the sorties to ranges. The DEIS fails to provide mapping of military airspace and ranges where chaff would be allowed.

It is also omnipresent in some parts of the West. As a 1994 survey by Nellis AFB reported, "Over 10 trillion of these fibers have been dropped on Nevada alone over the last 20 years." Presently, rural residents and BLM officials are finding clumps of chaff on public and private lands throughout central Nevada. We have attached a BLM map of known chaff littering sites.

UJ-196 The DEIS downplays the effect of this statement, when it says on page 4-72 that the use of chaff "decomposes form chemical and physical processes". Twin City Testing has been determined that chaff is "not degraded through biological action" (see attached).

The fact is, this conclusion is inconsistent with the Air Force's own findings. Section 4.4 of the April 1997 Record of Decision on the Final EIS on the Alaska Military Operations Areas made a commitment to "facilitate and encourage the continued study of chaff alternatives and biodegradable chaff." The earlier DEIS on the same proposal also found that: "The National Institute for Occupational Safety and Health (NIOSH) considers crystalline silica (as a respirable dust) a potential human carcinogen."

UJ-197 The DEIS claim that chaff poses no known risk to humans and animals is also in conflict with two other DOD reports, including the January 1992 DEIS for the Aircraft Conversions at the 103rd Tactical Fighter Group, Bradley International Airport, Connecticut, as well as for the Air National Guard Readiness Center, Andrews Air Force Base, Maryland. The earlier DEIS states, "Wind blown particles would tend to concentrate on the lee side of water bodies where nutrient levels are higher. Surface feeding wildlife, such as ducks, may consume chaff particles on the surface of their primary vegetation. These would either pass through the digestive system or form compacted pellets in the gizzard." On page 4-72 the DEIS states, "No studies on chaff consumption by wildlife have been conducted (U.S. Air Force, 1997). Hypothesized effects of chaff on wildlife have included disruption of feeding, behavior of digestion, toxicity, and inflammatory response in the respiratory system, potentially resulting in silicosis".

While other limited studies have been performed on the human health and ecological effects of chaff - including at the University of Maryland and the University of Delaware - the results are mixed, and some are not directly applicable to high desert, basin and range environments found in the western U.S.

The Nevada Division of Environmental Protection (DEP), for example, reviewed Defense Department documentation of the risks associated with chaff. Although the state's investigation "did not provide the Division with a definitive answer as to the environmental effects of chaff on public and private lands in Nevada," the DEP identified two primary concerns:

"The first concern is from inhalable particulate below PM10 which may occur from the decomposition and resuspension of fiber particulate by mechanical means. The Division's second concern deals with the physical deposition of what could be considered solid waste on public and private lands in the State of Nevada. There is very little information on the amounts of chaff currently deposited and how these fibers decompose in the environment."

The report concluded, "... the Division does not feel that adequate studies have been done to assure that there are no environmental risks posed by the fibers." In the opinion of RAMA, this should be the jumping-off point for the DEIS, instead of the reversed position that chaff poses no known risk to human health.

UJ-198 Indeed, the DEIS would do well to follow the lead of the Desert Eglon South Chaff Survey conducted by Nellis AFB in March 1994. Among the survey's findings: "More research is needed, especially concerning the behavior of chaff in anaerobic or acidic conditions found in wetlands".

"This last category of environmental damage relates to the level of litter which is currently accumulating in some areas of the MOA from the use of chaff and flare debris. In most cases the litter from aircraft operations probably is not more deleterious to the environment than common roadside litter such as bottles and cans found in the area. In the case of WSA's, however, a case can be made that litter, fire scars, and debris detract from the naturalness, and infer human presence which is specifically identified in the Wilderness Act as negative impacts for wilderness areas.

"Litter from chaff and flares, and other debris from Air Force aircraft operations has the potential to impact naturalness. So do fire scars started by flares. Jet overflights have the potential to impact solitude and incur human presence.

"Potential environmental issues involve injury from falling debris, impacts to air quality, effects on soil and water, and effects on biological resources. Ingestion or inhalation of chaff by wildlife or livestock, physical effects on the skin or feet (i.e. birds using chaff as a nesting material, or chaff becoming embedded in the paws of animals), indirect effects on vegetation due to changes in soil chemistry, and indirect effects of changes in water chemistry on aquatic life are also potential environmental issues related to chaff.

"Some small bundles of chaff were found as well as three large clumps of chaff fibers."

While the long-term effects of chaff may be unknown, some of the immediate physical impacts are. In 1992, the Army found: "Glass and carbo fibers and, likely iron fibers deposited on soils are susceptible to wind resuspension until immobilization occurs. However, even those fibers immobilized on soil surfaces can be resuspended by physical forces such as foot and/or vehicular traffic. Thus, there is a persistent risk of fiber inhalation and mitigation efforts will likely be required for areas containing high fiber concentrations."

RAMA urges the DEIS consider all of these reports before categorically discounting any impact of chaff on human health. Beyond that, we oppose the current and proposed use of chaff until sufficient independent analysis of the potential impacts has been completed. Given the amount of time that the problems with chaff have been known, residents of the rural west will no longer accept a lack of documentation as a claim of "no impact."

Another important point is that the military is dropping chaff on private property throughout the West without permission of the landowners below. Regardless of environmental or health impacts, this may be a violation of private property rights, since it constitutes disposal of a solid waste.

But chaff represents more than garbage on the terrain. The DEIS for the Proposed Expansion of German Air Force Operations at Holloman AFB, NM, USAF, June 1997 (page 2-40) notes that "[pyrotechnic] chaff is considered to be a munition because it uses an explosive charge to disperse the chaff upon release." The DEIS for Enhanced Training in Idaho makes a similar finding: "The chaff is ejected from the plastic cartridge using a small pyrotechnic device that remains on the aircraft".

The BLM has authorized the use of chaff in Idaho and Nevada over public lands associated with operations at Mountain Home AFB and at ranges in the southwest. In the opinion of RAMA, this raises serious questions. We believe the BLM has a mandate to protect public safety on lands it administers. But how can the BLM assure public safety on these lands where it allows the use of chaff and flares? How will the agency alert the public that the lands are being used as part of a training range? What are the liabilities for the BLM in the event of an accident involving chaff?

We would raise the same questions for publicly-accessible lands administered by the Department of the Interior (DOI). Since there is inconclusive evidence on the potential environmental impacts of chaff - including its effects on human health - RAMA believes the DOI and BLM should adopt a policy that the use of chaff be limited to lands which have been formally withdrawn for military uses.

White Phosphorus

The DEIS notes on page 2-44 the use of White Phosphorus in ordnance. However the DEIS fails to adequately describe the potential impacts of this substance. For more than 10 years, the cause of the catastrophic waterfowl mortality in Eagle River Flats has been a mystery. Now, scientists at the Cold Regions Research and Engineering Laboratory and Dartmouth Medical School have determined the cause of high waterfowl mortality at the Army's Eagle River Flats, located 15 miles north of Anchorage. The cause of death for many of the ducks and swans has been the ingestion of white phosphorus particles left from smoke-producing shells fired on the range. The DEIS failed to document the potential impacts to wildlife, human health and the environment. Is white phosphorus reactive in air? Is white phosphorus irritating to the nose, throat and lungs as well as the skin, eyes and mucous membranes? If white phosphorus were ingested could it be absorbed from the gastrointestinal tract or through the lungs? Can white phosphorus cause "phossy-jaw"? Can white phosphorus cause chronic poisoning, anemia, loss of appetite, gastrointestinal weakness and weakness of bones, teeth, eyes, myosis, dilation of pupils, retinal hemorrhage, congestion of blood vessels or pallor?

Titanium Tetrachloride

Some of the activities proposed with the Expansion of German Air Force Operations at Holloman AFB - including the potential use of Cold Spot cartridges - will result in the release of titanium tetrachloride. RAMA believes the DEIS does not fully describe the possible release, the potential for off-range contamination, or the environmental consequences of the use of titanium tetrachloride, including but limited to, potential ground, air and water contamination, impacts to human health and impacts to wildlife.

Instead, the document's discussion of the environmental impacts on page 2-70 found that titanium tetrachloride "quickly becomes inert and dissipates." This is inadequate.

According to E.I. duPont deNemours & Co., the manufacturer of titanium tetrachloride: "Titanium tetrachloride (TiCl₄) is manufactured by the chlorination of titanium-bearing ores in the presence of coke as a reducing agent. Titanium tetrachloride is a colorless to light-yellow liquid with a pungent odor. Titanium tetrachloride is very susceptible to hydrolysis, and the liquid fumes strongly when exposed to moist air. The fumes are dense and persistent and consist of hydrochloric acid, finely divided particles of titanium oxychloride and hydrated oxides of titanium." In its description of health hazards, the company said: "Titanium tetrachloride is a powerful desiccant and contact with the liquid product will cause burns from both chemical and thermal effects. The vapor is also hazardous and is extremely irritating to the skin, eyes, nose and throat. Overexposure to the vapor may cause burns to the eyes and lungs."

Based upon this description and effects of titanium tetrachloride, and the precautions which OSHA and other federal, state and health organizations recommend when working with the substance (see attached fact sheets and documents), RAMA believes the military must investigate this issue much more thoroughly.

The DEIS failed to adequately describe in full the environmental consequences of the use of gunpowder and titanium tetrachloride, including but not limited to, potential ground, air and water contamination, impacts to human health and impacts to wildlife. Describe in full the highly corrosive nature of titanium tetrachloride and its ability to liberate heat and hydrochloric acid upon contact with

We have learned of titanium tetrachloride's connection with vanadium, and would like to submit these additional concerns for full study: "Does the chemical makeup of titanium tetrachloride include Vanadium? If so, what are the potential health and environmental risks?"

We believe there is the possibility of significant off-range contamination in the event that ordnance is used which releases titanium tetrachloride. In response to RAMA's investigation into the use of titanium tetrachloride at the 17,280 acre Bravo 16 Range located at NAS Fallon, Nevada DEP Administrator Lew Dodgion noted the potential dispersal of titanium tetrachloride off-range: "If the ordnance landed near a range boundary, then the potential would exist."

Lasers

The military is increasingly turning rural America into a range for laser weapons research and testing, endangering residents of towns near the ranges, as well as motorists on roads around them. Military laser hazards derive from three factors: their high-powered output, their exemption from normal safety regulations and the lack of non-military controls on their use in training exercises in the rural U.S.

Despite the growing body of knowledge about the dangers which lasers represent, DOD laser components that are designed for actual combat or combat training operations or are classified in the interest of national security are exempt from radiation safety and performance standards for laser products (21 CFR 1040.11). The exemption has been in effect since June 1986, when the Food and Drug Administration (FDA) granted a Pentagon request for the exclusion. As FDA Acting Commissioner Sherwin Gardner wrote in his letter of approval: "It is my understanding that this exemption is necessary because laser products that are used by the military ... require capabilities which do not lend themselves to full compliance with all provisions of the laser standard promulgated under the [Food and Drug] Act. Your request for exemption acknowledges that in most instances the specified defense mission for which the products are intended could not be fulfilled if total compliance with the standard were required."

Nevertheless, laser operations cause injuries to eyes and skin - more fully described below - which the military has acknowledged and taken efforts to mitigate. A year after the military received the FDA exemption, The Washington Times reported on November 19, 1987, that military officials would issue 100,000 protective eye goggles able to handle "small

mass, low velocity fragments" and lasers to the troops most likely to settle into battle or global emergencies.

There are significant and documented adverse effects to exposure to lasers. Thermal burns to the retina are the greatest hazard to the eye with little recovery possible. Symptoms of corneal damage to the eye by an ultraviolet laser are red, watering eyes and acute pain. Since infrared and ultraviolet lasers cannot be seen by the naked eye, victims of corneal eye damage from lasers may not be aware of the contact with, and injury by, lasers for several hours.

The risks of direct and indirect viewing of laser training activities are clearly described in the U.S. Department of the Navy document A-6E Laser Safety Program and Operating Procedures (CMAW-1 INST 3759.4A). All bombing ranges at the NAS Fallon are presently certified for A-6E TRAM laser operation. In describing the safety hazards of A-6E TrAM laser use, the report stated: "The intensity within the beam of the laser exceeds that of the sun, nuclear weapons, burning magnesium or arc lights. Though the laser beam is invisible, the eye is able to focus this energy onto the retina with possibly severe and damaging effects varying from spot blindness, if the direct beam is viewed from a long distance, to complete and total loss of sight, if the direct beam is viewed from a distance very close to the aircraft. This hazard exists within the laser beam, along the aircraft's flight path, out to a range of 6.0 nautical miles from the laser aircraft. The distance is increased when binoculars, spotting scopes or any other magnification device (including telescopic cameras) are used."

Specular reflections -- mirror-like reflections of laser energy from very smooth, flat highly polished surfaces such as mirrors, windows, polished metal and calm standing water -- should be treated as if they were the direct laser beam, according to the Navy document. Even the reflections from curved specular surfaces such as glass bottles or car bumpers can cause damage, even though their range of danger is much smaller. Indeed, one of the most serious eye injuries incurred from laser radiation in the Navy occurred from a specular reflection from a glass bottle. One can easily imagine the likelihood of similar injuries from unintentional exposure.

Another Navy document, NAVMEDCOMINST 6470.2, describes the biological effects of laser radiation on the skin, which range from a mild reddening to blisters and charring. Depigmentation, ulceration and scarring of the skin and damage to underlying organs may occur from extremely high powered laser radiation. The Navy is cognizant of the physical hazards associated with accidental exposure to laser radiation. As Manual SPAWARINST 5100.12A states: "All personnel in areas using Class 3b... or class 4 lasers shall be informed by formal classroom training about the potential hazard associated with accidental exposure to this form of radiation. In particular, the extraordinary danger of eye damage due to absorption by the organ shall be emphasized. Class 3b and class 4 lasers may also cause skin damage or damage to material by fire or explosion due to rapid heating from a focused beam."

UJ-201

UJ-201

Despite DOD documentation of laser hazards, unsafe training operations continue under the protection of the FDA exemption. But continued unregulated laser operations at laser ranges throughout the nation pose an unacceptable risk for rural residents and visitors. Clearly, control over training activities should be passed to a non-biased agency of the people. DOD should move to bring its ranges into compliance with FDA regulations and limit its training activities to ranges at which acceptable safety margins may be possible. These training activities should not continue at ranges that cannot meet the proper safety margins.

The DEIS provides inadequate information on the environmental consequences of laser use on the proposed range.

Thank you for the opportunity to comment on this crucial issue.

Sincerely,

Grace Bukowski
Grace Bukowski

Common Name: Titanium Tetrachloride
CAS Number: 7550-45-0
DOT Number: UN 1838
DATE: December 1989

Hazard Summary

- * Titanium Tetrachloride can effect you when breathed in.
- * Contact can burn the eyes. The fumes also irritate the eyes and higher exposure can damage the eyes.
- * Breathing Titanium Tetrachloride can irritate the nose, throat and air passages, causing cough and phlegm. Repeated exposure can cause chronic bronchitis and may cause emphysema. Higher exposures can cause fluid in the lungs, a medical emergency, and even DEATH.
- * Skin contact can cause burns.

IDENTIFICATION

Titanium Tetrachloride is a colorless or light yellow, fuming liquid with a pungent odor. It is usually found in a solution with a solvent, Dichloromethane or used with an inert gas such as Nitrogen. It is used to make iridescent glass, artificial pearls, smoke screens and a catalyst.

REASON FOR CITATION

- * Titanium Tetrachloride is on the Hazardous Substance List because it is cited by DOT and EPA.
- * This chemical is on the Special Health Hazard Substance List because it is CORROSIVE.
- * Definitions are attached.

HOW TO DETERMINE IF YOU ARE BEING EXPOSED

- * Exposure to hazardous substances should be routinely evaluated. This may include collecting personal and are air samples. You can obtain copies of sampling results from your employer. You have a legal right to this information under OSHA 1910.20.
- * If you think you are experiencing any work-related health problems, see a doctor trained to recognize occupational diseases. Take this Fact Sheet with you.

WORKPLACE EXPOSURE LIMITS

No occupational exposure limits have been established for Titanium Tetrachloride. This does not mean that this substance is not harmful. Safe work practices should always be followed.

- * Titanium Tetrachloride is corrosive. All contact with this chemical should be reduced to the lowest possible level.

WAYS OF REDUCING EXPOSURE

- * Where possible, enclose operations and use local exhaust ventilation at the site of chemical release. If local exhaust ventilation or enclosure is not used, respirators should be

- worn.
- * Wear protective work clothing.
- * Wash thoroughly immediately after exposure to Titanium Tetrachloride.
- * Post hazard and warning information in the work area. In addition, as part of an ongoing education and training effort, communicate all information on the health and safety hazards of Titanium Tetrachloride to potentially exposed workers.

This Fact Sheet is a summary source of information of all potential and most severe health hazards that may result from exposure. Duration of exposure, concentration of the substance and other factors will affect your susceptibility to any of the potential effects described below.

HEALTH HAZARD INFORMATION

Acute Health Effects

The following acute (short-term) health effects may occur immediately or shortly after exposure to 2,4-Dinitrophenol:

- * Eye and skin contact can cause burns, with scarring.
- * Breathing Titanium Tetrachloride irritates the throat and air passages, with cough and phlegm. Higher exposures can cause a build-up of fluid in the lungs (pulmonary edema), a medical emergency.
- * High or repeated eye exposure to the fumes can cause eye damage.

Chronic Health Effects

The following chronic (long-term) health effects can occur at some time after exposure to Titanium Tetrachloride and can last for months or years:

- Cancer Hazard**
 - * According to the information presently available to the New Jersey Department of Health, Titanium Tetrachloride has not been tested for its ability to cause cancer in animals.

Reproductive Hazard

- * According to the information presently available to the New Jersey Department of Health, Titanium Tetrachloride has not been tested for its ability to adversely affect reproduction.

Other Long-Term Effects

- * Repeated exposure can cause chronic bronchitis and may cause emphysema, with symptoms cough and shortness of breath. This effect is more likely at exposures where irritation is noticeable.

MEDICAL

Medical Testing

- * Ling function testing before employment with Titanium Tetrachloride and at regular times after that is recommended.
- * Seek medical attention if illness or overexposure is suspected.

Any evaluation should include a careful history of past and present symptoms with an exam. Medical tests that look for damage already done are not a substitute for controlling exposure.

Request copies of your medical testing. You have a legal right to this information under OSHA 1910.20.

WORKPLACE CONTROLS AND PRACTICES

Unless a less toxic chemical can be substituted for a hazardous substance, ENGINEERING CONTROLS are the most effective way of reducing exposure. The best protection is to enclose operations and/or provide local exhaust ventilation at the site of chemical release. Isolating operations can also reduce exposure. Using respirators or protective equipment is less effective than the controls mentioned above, but is sometimes necessary.

In evaluating the controls present in your workplace, consider: (1) how hazardous the substance is, (2) how much of the substance is released into the workplace and (3) whether harmful skin or eye contact could occur. Special controls should be in place for highly toxic chemicals or when significant skin, eye, or breathing exposures are possible.

In addition, the following control are recommended:

- * Where possible, automatically pump liquid Titanium Tetrachloride from drums or other storage containers to process containers.

Good WORK PRACTICES can help to reduce hazardous exposures. The following work practices are recommended:

- * Workers whose clothing has been contaminated by Titanium Tetrachloride should change into clean clothing promptly.
- * Eye wash fountains should be provided in the immediate work area for emergency use.
- * If there is the possibility of skin exposure, emergency shower facilities should be provided.
- * On skin contact with Titanium Tetrachloride, immediately wash or shower to remove the chemical.
- * Do not eat, smoke, or drink where Titanium Tetrachloride is handled, processed, or stored, since the chemical can be swallowed. Wash hands carefully before eating or smoking.

PERSONAL PROTECTIVE EQUIPMENT

WORKPLACE CONTROLS ARE BETTER THAN PERSONAL PROTECTIVE EQUIPMENT. However, for some jobs (such as outside work, confined space entry, jobs done only once in a while, or jobs done while workplace controls are being installed), personal protective equipment may be

appropriate.

The following recommendations are only guidelines and may not apply to every situation.

Clothing

- * Avoid skin contact with Titanium Tetrachloride. Wear acid-resistant gloves and clothing. Safety equipment suppliers/manufacturers can provide recommendations on the most protective glove/clothing material for your operation.
- * All protective clothing (suits, gloves, footwear, headgear) should be clean, available each day, and put on before work.

Eye Protection

- * Wear splash-proof chemical goggles and face shield when working with liquid, unless full facepiece respiratory protection is worn.

Respiratory Protection

IMPROPER USE OF RESPIRATORS IS DANGEROUS. Such equipment should only be used if the employer has a written program that takes into account workplace conditions, requirements for worker training, respirator fit testing and medical exams, as described in OSHA 1910.134.

- * Engineering controls must be effective to ensure that exposure to Titanium Tetrachloride does not occur.
- * Where the potential exists for exposure to Titanium Tetrachloride, use a MSHA/NIOSH approved supplied-air respirator with a full facepiece operated in the positive pressure mode or with a full facepiece, hood, or helmet in the continuous flow mode, or use a MSHA/NIOSH approved self-contained breathing apparatus with a full facepiece operated in pressure-demand or other positive pressure mode.

Common Name: Titanium Tetrachloride

DOT Number: UN 1838

DOT Emergency Guide codes: 39

CAS Number: 7550-45-0

Hazard rating NJDOH NFPA

Flammability - 0

Reactivity - 1

CORROSIVE

POISONOUS GASES ARE PRODUCED IN FIRE

DO NOT USE WATER

CONTACT WITH MOIST AIR OR WATER PRODUCES VAPORS OF HYDROCHLORIC ACID.

Hazard Rating Key: 0=minimal; 1=slight; 2=moderate; 3=serious; 4=severe

FIRE HAZARDS

- * Titanium Tetrachloride may burn, but does not readily ignite.
- * Use dry chemical or CO2 extinguishers. DO NOT USE WATER except in flooding amounts for large fires.
- * POISONOUS GASES ARE PRODUCED IN FIRE, including Titanium Oxides and Hydrochloric Acid.
- * CONTAINERS MAY EXPLODE IN FIRE.
- * If employees are expected to fight fires, they must be trained and equipped as stated in OSHA 1910.156.

SPILLS AND EMERGENCIES

If Titanium Tetrachloride is spilled or leaked, take the following steps:

- * Restrict persons not wearing protective equipment from area of spill or leak until clean-up is complete.
- * Remove all ignition sources.
- * Ventilate area of spill or leak.
- * Neutralize spill with lime or soda ash, and absorb liquids in vermiculite, dry sand, earth, or similar material and deposit in sealed containers.
- * It may be necessary to contain and dispose of Titanium Tetrachloride as a HAZARDOUS WASTE. Contact your state Environmental Program for specific recommendations.
- * Consult DOT Emergency Response Guidebook for evacuation distances.

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FOR LARGE SPILLS AND FIRES immediately call your fire department.

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HANDLING AND STORAGE

- * Prior to working with Titanium Tetrachloride you should be trained on its proper handling and storage.
- * Titanium Tetrachloride must be stored to avoid contact with WATER, POTASSIUM and STRONG OXIDIZERS such as CHLORINE, BROMINE and FLUORINE), since violent reactions may occur and poisonous gases produced.
- * Store in tightly closed containers in a cool, well-ventilated area away from MOISTURE and AIR.

FIRST AID

Eye Contact

- * Immediately flush with large amounts of water. Continue without stopping for at least 30 minutes, occasionally lifting upper and lower lids. Seek medical attention immediately.

Skin Contact

- * Quickly remove contaminated clothing. Immediately wash contaminated skin with large amounts of soap and water.

Breathing

- * Remove the person from exposure.
- * Begin rescue breathing if breathing has stopped and CPR if

- * heart action has stopped.
- * Transfer promptly to a medical facility.
- * Medical observation is recommended for 24 to 48 hours after breathing overexposure, as pulmonary edema may be delayed.

OTHER COMMONLY USED NAMES

Chemical Name:
Titanium Chloride

Not intended to be copied and sold for commercial purposes.

NEW JERSEY DEPARTMENT OF HEALTH
Right to Know Program
CN 368, Trenton, NJ 08625-0368

ECOLOGICAL INFORMATION

Titanium Tetrachloride is a colorless liquid with a penetrating odor. It has been used with potassium bitartrate as a mordant in the textile industry, in dyeing leather, as a smoke producing screen, and in the manufacture of iridescent glass and artificial pearls. It may enter the environment from industrial discharges or spills.

ACUTE (SHORT-TERM) ECOLOGICAL EFFECTS

Acute toxic effects may include the death of animals, birds, or fish, and death or low growth rate in plants. Acute effects are seen two to four days after animals or plants come in contact with a toxic chemical substance.

Insufficient data are available to evaluate or predict the acute, short-term effects of Titanium Tetrachloride to aquatic life, plants, birds, or land animals.

CHRONIC (LONG-TERM) ECOLOGICAL EFFECTS

Chronic toxic effects may include shortened lifespan, reproductive problems, lower fertility, and changes in appearance or behavior. Chronic effects can be seen long after first exposure(s) to a toxic chemical.

Insufficient data are available to evaluate or predict the chronic, long-term effects of Titanium Tetrachloride to aquatic life, plants, birds, or land animals.

WATER SOLUBILITY

Titanium Tetrachloride has high water solubility. Concentrations of 1,000 milligrams and more will mix with a liter of water.

DISTRIBUTION AND PERSISTENCE IN THE ENVIRONMENT

Titanium Tetrachloride reacts with water to form Titanium Oxychlorides and Titanium Dioxide. Consequently, Titanium Tetrachloride will not be highly persistent. However, some of the Titanium compounds formed may be persistent.

BIOACCUMULATION IN AQUATIC ORGANISMS

Some substances increase in concentration, or bioaccumulate, in living organisms as they breathe contaminated air, drink contaminated water, or eat contaminated food. These chemicals can become concentrated in the tissues and internal organs of animals and humans.

Titanium Tetrachloride probably will not accumulate in aquatic organisms or in aquatic ecosystems, but Titanium might accumulate in both.

SUPPORT DOCUMENT: AQUIRE Database, ERL-Duluth, U.S. EPA.

Appendix F

EXCERPTS FROM TITANIUM TETRACHLORIDE SPECIFICATIONS

E. I. du Pont de Nemours & Co., Inc. Specifications (Extracted from E. I. du Pont de Nemours & Company Brochure Titanium Tetrachloride)

This description was originally prepared to assist users of du Pont titanium tetrachloride in planning safe storage and handling procedures. The excerpts presented below are based on du Pont experience.

Titanium tetrachloride ($TiCl_4$) is manufactured by the chlorination of titanium-bearing ores in the presence of coke as a reducing agent. Titanium tetrachloride is a colorless to light-yellow liquid with a pungent odor. Titanium tetrachloride is very susceptible to hydrolysis, and the liquid fumes strongly when exposed to moist air. The fumes are dense and persistent and consist of hydrochloric acid, finely divided particles of titanium oxychloride and hydrated oxides of titanium. (Tables below give typical analysis and properties of $TiCl_4$).

[Typical Analysis (percent) Physical Properties]

Chemical Properties

Titanium tetrachloride breaks down almost completely on solution in water converting into colloidal dispersed titanium oxyhydrates. The reaction of liquid $TiCl_4$ with water is extremely violent, almost explosive. The products in strong HCl solution are clear at room temperature.

$TiCl_4$ dissolves in various alcohols (methanol, ethanol) forming salt-like solvates having good electrical conductivity. With the organic halides, $TiCl_4$ generally forms weakly conducting salt-like complexes.

Health Hazards

Titanium tetrachloride is a powerful desiccant and contact with the liquid product will cause burns from both chemical and thermal effects. The vapor is also hazardous and is extremely irritating to the skin, eyes, nose and throat. Overexposure to the vapor may cause burns to the eyes and lungs.

Oregon Metallurgical Corporation $TiCl_4$ Specification (Nov. 30, 1976)

Scope:

This specification covers titanium tetrachloride used in the production of titanium sponge.

Color:

The acceptable color of $TiCl_4$ will be water white to light straw yellow.

Chemical Composition:

Chlorine

$TiCl_4$	
Iron	
Vanadium	
Carbon	
Silicon	
Chromium	
Nickel	
Aluminum	
Tin	
Copper	
Manganese	
Sn, Cu, Mn:	
Quality:	
None	
99.8 Percent	
25 PPM	
25 PPM	
40 PPM	
10 PPM	
25 PPM	
25 PPM	
PPM	
PPM	
PPM	
PPM	
PPM	
25	

50	Specific gravity 201200C 1.726 (1)
50	Refractive index n _D 25 1.61 (1)
50	D
Total 100	Heat capacity, liquid 35.7 cal/deg mole, 250C (2)
	Heat capacity, gas 25.45 + 0.23 X 10 ⁻³ T - 2.36 X 10 ⁻⁵ T ² cal/deg mole (3)
	Heat of fusion 2.24 kcal/mole, - 250C (21.3 BTU/lb) (4)
	Heat of vaporization 8.346 kcal/mole, 136.40C (79.2 BTU/lb) (4)
	Heat of formation, liquid -192.1 kcal/mole, 250C (-1822.7 BTU/lb) (4)
	Free energy of formation, -175.9 kcal/mole, 250C (-1669.0 BTU/lb) (4)
	liquid
	Ref. (1)
	Ref. (2)
	Ref. (3)
	Ref. (4)
	Handbook of Chemistry and Physics, 48th Edition, 1967-1968.
	Chemical Engineers' Handbook, John H. Perry, Third Edition.
	Kelley, K. K., "U.S. Bureau of Mines Bulletin 476." (1949).
	Thermodynamic Properties of 65 Elements--Their Oxides, Halides, Carbides, and Nitrides, C. E. Wicks and F. E. Block, USBM Bulletin 605, 1963.
	[Cabot corporation TiCl ₄ (4) Specifications]
	Data Sheet from Soviet TiCl ₄ Specifications
	Impurity Content, Percent by Weight
	Impurity In technical Specifications In purified
	TiCl ₄ for pure TiCl ₄ TiCl ₄
	Grade 1,

Vendor shall be responsible for establishing and using sampling procedures and methods for chemical analysis to afford reliable assurance of the acceptable quality levels.

Timet Division, TCMA TiCl₄ Specification

The following tables are a tabulation of specifications, for TIMET titanium tetrachloride:

Catalytic Grade

Chemistry

Reported Maximum Typical Physical Characteristics

Tin 10 ppm 6 ppm APHA Color: 40 max.

Aluminum 20 ppm 6 ppm Clarity: no sign of turbidity

Iron 10 ppm S ppm

Vanadium 10 ppm 7 ppm

Silicon 10 ppm S ppm

Copper S ppm 2.5 ppm

Chromium S ppm 3 ppm

Residue 160 ppm 90 ppm

aOther elements by special request.

Physical Properties of Titanium Tetrachloride Reference

Color Colorless

Odor Sharp, fumes in air

Molecular weight 189.71 (1)

Melting point -250C (1)

Boiling point 136.40C (1)

Cl (free) 0.003
 O2 (oxychlorides)
 Grade 0 0.0005
 Grade 1 0.001
 Grade 2 0.003
 Grade 3 0.007

according to
 TU-39--69
 VOC3 0.33 0.0034 0.0034
 AlCl3 a 0.02 0.005 0.005
 SiCl4 a 0.4 0.006 0.006
 Si2OCl6 a 0.04 0.003
 FeCl3 a 0.012 0.0029 0.0029
 CC14 0.06 0.005
 CC13COCl 0.005 0.0005 0.0002
 CS2 0.01 0.00002 0.00002
 COS 0.009 0.00002
 Oxygen
 (oxychlorides) 0.03 0.001 0.001
 Si3O2Cl8 0.007 0.002
 C6Cl6 0.015
 CO2 0.01
 COCl2 0.5 0.0005 0.00002
 Cl2 0.05

Arbitrarily, the amounts of Al, Fe, and total Si are limited.
 The allowable content of impurities in titanium tetrachloride going for the production of sponge titanium is no more than the following percent by weight:

Impurity (percent by weight)
 Al 0.0015
 Si 0.005
 Fe 0.004
 V 0.004
 COCl2 Trace

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

We are in support of the proposed expansion of the Air Force training & the German operations

DATE: 7/28/92

**Mission and Master Plan
Programmatic Environmental Impact Statement
Fort Bliss, Texas and New Mexico**

Thank you for your input

PLEASE PRINT

With due consideration of the far-reaching effects upon human habitation and wild life habitat on Otero Mesa, I believe that the expansion of the military range will be detrimental, and urge you to reconsider all of the options available to the Military.

DATE: July 28, 1992

The German Air Force has been offered a place to do its training in Spain and in Italy. Because the expense was greater in those locations, it opted to use the USA. Also, the American Government is helping to subsidize the operation (it is a fact that the German Government is in financial problems) and the populace of America is having the wool pulled over its eyes.

Where is the true consideration for the environment? Only the monetary gain seems to be important to the business community of Alamoogordo.

.... CONTINUE ON BACK FOR MORE SPACE

NAME: Barbara E. Wagner
ADDRESS: 841 Laborata Canyon Road
CITY: La Buz,
STATE/ZIP CODE: New Mexico 88337

Please check if you would like to receive a copy of the Draft Environmental Impact Statement. []

Please Hand This Form In, or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA.
23665-2769

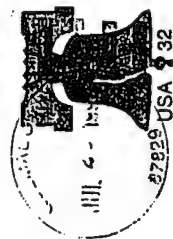
.... CONTINUE ON BACK FOR MORE SPACE

NAME: KFC - White Sands
ADDRESS: 730 S. White Sands
CITY: Alamoogordo
STATE/ZIP CODE: NM 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769



Mr. Frank Parker
10 H-27 EVA
102 Andrews Street
Suite 102
Ft. Belvoir, Ft. Belvoir, VA

23663/2700 28

07-28-97

Please NO German Tornado
flights on VR-176
Thanks

7/28/97

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

KGM

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/30/97

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Savanna F. Ditzler
July 30, 1997.

..... CONTINUE ON BACK FOR MORE SPACE

NAME: C. Ditzler
ADDRESS: Box 1429
CITY: Albuquerque, NM
STATE/ZIP CODE: 85310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

ICC to human tornado flights
on VR-176

Thank you
Lance Muncy

Dear Ms. Parker.

I am against the proposed use of low level German
Tornado training flights on the VR-176 flight path. I view
this as an outright sale of our peace and quiet and quality
of life to foreigners. If this expansion goes through, it
will have a very negative impact on people, livestock and
wildlife in this area.

Sincerely,



Joseph F. Kennedy
Star Rt 2 Box 119
Kingston, NM 88042

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Mike Jones
 10702
 State St Bx 68
 Hillsboro, N. Mex. 88

JOE KENNEDY
STAR PT 2 BOX 11A
KINGSTON, NM 88042-

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, VA
23665-2769

27 MCGLETT.

"During 1961, not to the contrary with evidence and I
 knew I didn't tell the truth and the journal editorials observed
 this and I was not able to get away from the fact that we had
 an enormous story misinterpreted and I thought it will be
 for Khrushchev, signed by me, signed by Khrushchev, view a very little
 "Khrushchev
 "This kind of building

100



**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 31 July 87

I support this issue of the
bookings change.

Why should 6 or 7 people be housed in the
Cushman the military had of 100 of them
are at the base. I
We need the range for our Air Force
as well as the civilian.

We had our AF in Germany supporting
their economy for 60 plus years.
It now over there.

When I go out to often through there a plane
is only a few seconds but it is
lots of \$ for the local economy & our
growth.
Luis A. Sotol

.... CONTINUE ON BACK FOR MORE SPACE

NAME: Luis A. Sotol
ADDRESS: 810 9th St.
CITY: Alamogordo
STATE/ZIP CODE: N.M. 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☒

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 8/

We are supportive of the German forward
aircraft expanding in our area. The German
contingent has been a real asset to our
community.

.... CONTINUE ON BACK FOR MORE SPACE

NAME: Jimmy & Leah Jones
ADDRESS: Po Box 1445
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. ☐

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 8/1/97

I STRONGLY SUPPORT THE DEVELOPMENT OF A DEDICATED BOMBING RANGE TO SUPPORT
GERMAN AF TRAINING AND CURRENT AND FUTURE USAF MISSIONS AT HOLLOMAN AFB.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: ROBYN LUEVANO
ADDRESS: 2 P.O. BOX 9
CITY: ALAMOGORDO,
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
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WRITTEN COMMENT SHEET

Thank you for your input.

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I STRONGLY SUPPORT THE DEVELOPMENT OF A DEDICATED BOMBING RANGE TO SUPPORT
GERMAN AF TRAINING AND CURRENT AND FUTURE USAF MISSIONS AT HOLLOMAN AFB.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: ERNEST LUEVANO
ADDRESS: 2 P.O. BOX 9
CITY: ALAMOGORDO,
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

I STRONGLY SUPPORT THE DEVELOPMENT OF A DEDICATED BOMBING RANGE TO SUPPORT
GERMAN AF TRAINING AND CURRENT AND FUTURE USAF MISSIONS AT HOLLAMAN AFB.

DATE: 8/1/97

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Charles G. De...
ADDRESS: Box 547
CITY: HA W P NM
STATE/ZIP CODE: 87532-5

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

I fully support all the efforts put forth by the Environmental Impact Study
and the Air Force toward location of a bombing range for use by Holloman AFB.
It is unfortunate that the "Nay" sayers tend to l very vocal. I can assure
you that there is wide public support toward giving Holloman the range they
need.

DATE: 08-01-97

***** CONTINUE ON BACK FOR MORE SPACE *****

NAME: Pete Cook
ADDRESS: c/o PO Box 9
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 8-1-97

I strongly support the planned expansion of the German Air Force Training Program. A project of this magnitude will enhance and ensure the continued growth in and around Alamogordo.

The funding of the project, while expensive will be in large part shared by Germany, Ohio County and RL of Southern N.M. will benefit by increased revenues being brought into the state.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Hotch Manning
ADDRESS: 1905 S. Valley Dr.
CITY: Las Cruces, NM
STATE/ZIP CODE: NM 88005

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []
Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 8/1/97

I strongly support the planned expansion of German Air Force operations at Holloman AFB

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Harvey O Winkle dba Construction Unlimited
ADDRESS: PO Box 896
CITY: La Luz
STATE/ZIP CODE: NM 88330

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]
Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769



Dan Sievers
Vice-President

723 New York Ave.
Alamogordo, NM 88310
(505) 437-0095
Cell: (505) 430-8844
Fax: (505) 437-7737

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 8-1-97

The Alamogordo economy has enjoyed a stable and growing economy throughout the years. This growth resulted from one major factor, the Holloman Air Force Base. Without the Base, Alamogordo would be a minor fraction of what it is today.

In the months to come, the German Air Force will be signing an agreement with the U.S. Government to allow training of their troops on the Holloman Air Force Base. This agreement is an integral part of the growth expectations for Alamogordo. I strongly support this mission. It is not only a great opportunity for the German, it's beneficial to our economy as well. It increases the existence of the Base through continued exercises and possibly future training missions for Military Forces world wide. The U.S. is timely the leading nation in NATO. Other countries recognize this as well. In war times, NATO nations will need thorough training from us in order to successfully accomplish the tasks at hand. This bombing range would supply this need training.

Simply maintaining the Holloman A.F. Base accounts for over 4000 MW worth of Economic Impact. Obviously, this is the well in which our economy draws spring. The Bero County area does support the German Training mission as well as the soldiers currently on Base.

Please make note of my concern, as Alamogordo opposes the existing Base. Thank you

NAME: Dan Sievers
ADDRESS: PO Drawer P
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []
Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 8-1-97

*To whom it may concern;
We do not to heavily support the expansion program.*

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Mark Has Thimer J O'Sullivan
ADDRESS: 74 Adams Cyn Rd
CITY: Alamogordo
STATE/ZIP CODE: NM 88315

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []
Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

7C 40 100224
Denning, New Mexico
82030
Aug 1, 1997

Ms Sheryl R. Parker
HQ ACC/CEVA
129 Andrews St. 102
Langley Air Force Base Virginia
23665-2796

Dear Sheryl

The following one to be considered as comments on
the proposed low level flight training program by the German
air force over several New Mexico counties on a route
known as VR176.

My family owns and operates ranch properties directly
under the proposed route in ~~the~~ Socorro, Sierra and Luna
counties. We live in Luna county and have never heard
of the proposal until today. There has been no notice
in the news media and in checking with Luna county
officials they have no knowledge of such a plan. I
understand that county officials told residents of Socorro
county have only recently heard of the plan as well
even though you folks in the Air Force have apparently
been planning this for a long period of time. You have
done an injustice to the residents of these counties where
negative impact will occur.

Just of all the noise levels at altitude of 500
feet or less is completely unacceptable. Our livestock
will be scared and stampeded, especially when we are
moving them in herds or large bunches ~~when~~ underneath
or close to a low level flight. The cattle can be run
thru barbed wire fences and injure themselves. Then could

ALAMOGORDO PUBLIC SCHOOLS
Office of the Superintendent
1211 Hawaii Avenue
P. O. Box 617
Alamogordo, New Mexico 88311-0617
Phone: 439-3270 Fax: 439-3373

August 1, 1997

Air Combat Command Environmental Analysis Branch
HQ ACC/CEVA
Attention: Ms. Sheryl Parker
Langley Air Force Base, Virginia 23665-2769

Dear Ms. Parker:

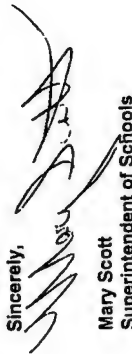
Thank you for the opportunity to provide input regarding the Air Force proposal
for a bombing range to be constructed on McGregor Range land in Otero County,
New Mexico. The Alamogordo Public Schools unequivocally supports the
creation of a dedicated bombing range on Otero Mesa.

We believe an increased German Air Force presence at Holloman AFB will benefit
the community and help stabilize the wide fluctuations in military/civilian
manpower we have experienced over the past 20 years. This will enable the
district to more accurately project student enrollment, attract and retain qualified
staff, and contribute to the effective management of physical plant requirements.

We also feel that the presence of German dependents will enhance the cultural
diversity of the community and offer opportunities for our student population to
gain first hand knowledge of students from another country, an important factor in
the maturation of individuals in an era when a globally independent economy has
become fact.

If we can be of further assistance, please do not hesitate to call us.

Sincerely,



Mary Scott
Superintendent of Schools

MS:slm
c: Tools Green - President, Chamber of Commerce

2.
 easily trample each other as well as injure the people who may be herding them or horse back. Horses are easily scared and could throw their riders and cause severe injury. The planes can come out of nowhere and give no warning before severe injury or even death may occur to animals or humans due to the speed of the air craft. There can be damage to structures by flying too close to homes, windmills and other buildings in these rural settings due to vibrations and wind currents. The noise pollution to wildlife, domestic animals and humans is unwanted. Flying at levels below 500 feet is unwanted.

I feel we should not be training German Pilots on American soil. I also feel it is unfair for the Air Force to force negative impacts on counties and residents located far away from the Holloman Air Base in Otero County, New Mexico. Otero county gets the economic boom and the rest of us suffer the consequences. That is not right.

You should extend the period for public comment and give people in the affected counties adequate notice and information about the proposal.

W-203

Joe Biel Mann

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Betty A. Whitmore
 P.O. Box 198
 Williamsburg, New Mexico 87942

2-1-97

Halloman Air Force Base
Public Affairs
490 1st Street 2800
Halloman AFB, N.M. 88330-3287

To Whom It May Concern:

We are not in favor of the Proposed Flight
Expansion of Halloman AFB.

We live in Carrizozo and believe these flight
expansions from military personnel being
from a foreign land of Germany & NATO
will cause great problems for our area.

Jack Walthall
P.O. Box 581
Carrizozo, N.M. 88301

Dear Ms. Parker,

I am against the proposed use of low level German
Tornado training flights on the VR-176 flight path. I view
this as an outright sale of our peace and quiet and quality
of life to foreigners. If this expansion goes through, it
will have a very negative impact on people, livestock and
wildlife in this area.

Sincerely,

Andie + George

5 Ave

THIS PAGE INTENTIONALLY LEFT BLANK

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

Richard Patter

*His place Ronda from
Damon's mts.*

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: Aug 2/97

W-204
It is definitely not in the best interests of the residents of Doña Ana County to increase noise levels. Particularly, since because of the there is insufficient monitoring and inspection. Structural damage has occurred and inspection flights are being delayed. In addition, the potential for a subsequent driving accident would be lessened. But production is affected by noise levels.
I am not sure over and near Fort Sumner is the best place for the launching of research balloons by A-10's at the facility. There is a significant amount of launching of balloons here. Due to the launching of balloons, there is a lot of traffic. Those aircrafts which are in the present to launching of balloons are not the best quality of the aircrafts. - respectfully

NAME: John W. McMillan
ADDRESS: Box 89
CITY: Fort Sumner, NM
STATE/ZIP CODE: New Mexico 88119

Please check if you would like to receive a copy of the Final Environmental Impact Statement. |

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

ORIGINAL
JMC

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 8-2-97

I would like to express my 100% support of the expansion of operations at Holloman AFB. There are many German families in my neighborhood and they are excellent neighbors. Also aircraft overflights are not a problem and in fact I look forward to them. The only thing I would like to see is the McGregor Range controlled out of New Mexico instead of Texas. Also I am 100% in support of the bombing range on Grand mesa.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: DAVID GOTTULA
ADDRESS: 2544 Desert Hills Dr
CITY: Alamosa, CO
STATE/ZIP CODE: New Mexico 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. |

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 8/11/97

My comments consist of requesting that the comment period be extended. I would like to make many more comments but am not able to research some subjects in the time allowed. The list of prepared names I sent to these people that prepared this document. It seems intolerable to expect an individual to properly research and comment on a document of this complexity and length that required twenty-three people to prepare, in the time allowed.

W-205

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Innis Lewis
ADDRESS: P.O. Box 611
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. (X)

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

SOUTHWEST CENTER FOR BIOLOGICAL DIVERSITY



August 3, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

We have the following comments on the DEIS for Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico. Please respond to each and every point and sub-point with an individualized response. *Please do not attempt to evade answering questions or responding to comments by grouping responses or simply failing to actually answer questions or concerns.*

[We request extension of the comment period as our organization only had four days to review the DEIS. Please inform us ASAP whether the comment period extension will be granted.]

W-206

[The Purpose and Need for the project is inadequately established and inadequately explained or explored. The purpose section references international agreements then fails to analyze or explore further these issues. The Purpose and Need section fails to provide a compelling need for the project other than vague goals of international co-operation. The section links this project to international relations and the U.S. role in NATO yet fails to discuss or explore these issues further. How does this action relate with other international agreements and bodies such as the United Nations or other planned projects relating to the referenced "bilateral agreement". We would like to receive a copy of the "bilateral agreement" referenced and see it appended to the

W-207

W-208

1

P.O. Box 17839, Tucson, Arizona 85731-7839 TEL: 520.733.1391, FAX: 520.733.1404
Email: swcbd@sw-center.org, <http://www.envirolink.org/orgs/sw-center>
♻️ *post consumer recycled paper*

W-208

FEIS.

2. This analysis is a classic case of illegal piecemealing or segmentation of projects through the NEPA process. Holloman Air Force base must conduct a programmatic base and mission wide EIS to determine its actual effect on the environment. Additionally, the air routes used by Holloman and others need a programmatic NEPA and ESA Section 7 Consultation. The analysis contained in the DEIS is very misleading and incomplete. For example the no-action alternative considers the baseline of activities to be that which is currently 'approved or authorized'. There are numerous NEPA documents related to this proposal which utilize the same methodology, or which conclude that Holloman AFB is the only logical site the particular project, for example in the DEIS on page 1-3 it states "In July 1992, Dick Cheney, U.S. Secretary of Defense and Volker Ruehe, the German Federal Minister of Defense, announced the plan to locate the GAF training operation at Holloman AFB was based on several factors. First, collocation of the German Tornados and the German F-4 training program (recently moved from George AFB to Holloman AFB) would reduce German costs by allowing for economies of scale. Second, the proximity of a large German community at Fort Bliss, approximately 920 German military and dependents would reduce the logistics support requirements. Third Holloman AFB provides cross-training opportunities with German missile training units located at nearby Fort Bliss in El Paso. Fourth Holloman AFB had the apparent capacity and the Military Training Routes (MTRs), Military Operating Areas (MOAs) and Ranges to provide the requested training. Fifth, the German Command Element is located in El Paso, which keeps the German training unit close to the Headquarters. All these factors directly contributed to the decision to locate the GAF Tactical Training Center (TTC) at Holloman AFB". The 1991 EA: Beddown of the 37th Tactical Fighter Wing at Holloman AFB (referred to in the references section as an EIS), the 1993 unspecified NEPA document titled Proposed Beddown of the German Air Force PA-200 and an additional AT-38 Training Unit at Holloman AFB, New Mexico, the 1996 Draft Environmental Assessment of Proposed Airspace Modifications to Support Units at Holloman AFB, New Mexico and other documents note a hodgepodge of NEPA documents each ramping up activities, airspace usage and German military presence in the U.S. In fact, the series of events leading up to this EIS are classic, case-studies of an agency's segmenting and piecemealing a project and series of projects through the NEPA process. The DEIS summary of events is a summation of successive incomplete segmented analysis all of ignored and failed to adequately analyze the obvious and pre-planned future expansion of activities, airspace utilization and German military presence in the U.S.

A programmatic NEPA analysis of the "German Program" in the U.S. must be conducted and this study must disclose probable, likely or reasonably foreseeable expansions of the German military presence in the U.S. The DEIS in question contains no mention of future expansions and Sheryl Parker at Air Force Environmental HQ Command specifically stated that even if there were future expansions planned that this knowledge would not be available to someone at her level or the people preparing the EIS. The cumulative effects analysis section of the DEIS is grossly incomplete for this and other reasons. For example in the references section of the DEIS documents titled USACE, Fort Worth District, 1996a. German Air Force Tornado Beddown, Phase II Utility Study, Holloman AFB. Final Survey Report, Volume 1. July and USACE, Fort

2

Worth District, 1996c. Natural Gas System Analysis for German Air Force Tornado Beddown, Phase II, Holloman AFB are referenced and terms such as Phase II are used strongly implying that authorities were aware early on that there may be additional phases and implying that there may be future expansions. The Air Force's campaign of segmented these projects through the NEPA process over at least a seven year period must end here with the environmental study in question. The deficiencies in the analytical

On page ES-2 it states "To support full training needs, MOAs and MTRs in the area would be used for low level flight operations. This action would capitalize upon using restructured airspace from an unconnected previous proposal. That proposal which is currently under consideration (Proposed Airspace Modifications to Support Units at Holloman Air Force Base, New Mexico, (U.S. Air Force 1996), involves air space modifications in southern New Mexico and west Texas...if implemented the modified airspace would be used by the additional 30 Tornados; if these airspace modifications are not implemented existing airspace would be used". The DEIS states that these actions are unconnected but this obviously is not the case. The above referenced action is utterly connected to the action at hand in the DEIS. This is a good example of the Air Force's analytical trickery it employs throughout the DEIS in order to mask the significant and negative environmental effects of its proposed actions.

The benchmark or baseline for all analytical purposes in the DEIS is a no-action alternative which maintains currently programmed or authorized flight and other activities and then compares and contrasts that with the increase proposed by the DEIS. This is the method of analysis used for all recent past similar activity increases emanating from Holloman AFB and the Holloman AFB Aerodrome and other related AF SW area Aerodrome's. This method is grossly misleading and inaccurate in a number of ways for example: The process of ramping up activity in a staged-in analytical process will never get at the true, total actual environmental impact. By stating well there are already 2400 supersonic sorties per year over the affected airspace and we're only adding another 24 the effects may seem insignificant. "The proposed action includes a minimal number (24) of supersonic sorties per year...About 2,900 supersonic sorties are flown annually in this airspace. The number of sorties under the proposed action is less than one percent of this amount. From a noise perspective, the increase in supersonic sorties is considered to be negligible." What about the environmental effects of the 2900 supersonic sorties as a whole? Of the overflights as a whole? What NEPA document has looked at that as a whole? By comparing noise levels for this increase with existing noise levels from current overflight activities the total magnitude of disruption is never arrived at. A useful analogy might be a review of the drinking behavior of an alcoholic who already drinks 40 martinis per day and proposes to increase 4 martinis per day to a total of 44 martinis per day, but the review will be limited only to the effects of the additional 4 martinis per day-an increase of 4 martinis per day is a relatively minor increase when compared to an overall consumption of 40 martinis per day so a conclusion of no major additional adverse effects could be reached under this artificially constrained analysis method, yet this conclusion would be largely irrelevant, incorrect and meaningless. Any 12 year old would correctly assume that at the overall level of alcohol ingestion going on

3

major health problems are likely to ensue for the alcoholic. Yet the artificially narrow analysis will likely never reach that conclusion, especially if increases are done in stages rather than all at once; much like the situation with low level overflights from Holloman AFB including those from the German Air Force (GAF).

This analytical trickery is exactly the reason why NEPA was enacted in the first place, to force government agencies to take a hard look at the environmental consequences of their actions. In fact, numerous case decisions have expressly forbid agencies from segmenting projects through NEPA analysis for whatever reason.

The programmatic EIS on the "German Program" and a programmatic EIS on the flight routes in question in this DEIS must be conducted in order for the public and the decision maker to make a fully informed decision, with a complete understanding of the environmental effects of the actions in question.

The Air Force's clever but illegal and transparent "ramp-up" NEPA strategy has also been criticized by the U.S. Fish and Wildlife Service.

As another example of the "ramp-up" strategy which precludes the AF ever taking a hard look at their actions "The proposed increase in air space utilization under either the TTC or Existing Range training options would result in increased emissions affecting air quality" but what about the air quality issues as a whole as they relate to the flight paths when taken into account with other actions having a potentially cumulative effect on air quality?

Whatever options are chosen by the AF in terms of training options must disclose and analyze the environmental effects of their implementation. The document must disclose where the waters of the U.S. would be impacted how many acres would be impacted and what species may occur or utilize those acres?

The DEIS does not contain a reasonable range of alternatives as required by NEPA and implementing regulations. The AF's assertion that Holloman AFB is the only realistic location to meet the purpose and need for the project is in direct violation of NEPA and CEQ policy. Even if actions are outside the control of the action agency they must be analyzed if they are reasonable and in this case the AF is in control and has numerous other facilities. The range of alternatives must be expanded. In addition to our conclusion that various programmatic NEPA documents must be prepared for this and other actions to go forward, we specifically request an alternative be fully analyzed which does not involve overflights of federally designated wilderness, National Parks, National Monuments and over areas of known nests/reintroduction sites for Threatened and Endangered Species, including the California Condor. We also specifically request that for trade-off and analytical purposes an alternative which involves no military overflights at all be developed and fully analyzed. In this manner the public and decision maker will be able to realistically and accurately gauge the environmental effects of these added overflights and the overflight program as whole.

Please display in the FEIS each NEPA document relating to the Holloman AFB Aerodrome and the year of the decision and whether the decision involved a EIS and EA or a CE.

The Cumulative effects analysis is grossly deficient missing key projects like the spaceport which is in the planning phases. The cumulative effects to solitude in wilderness areas, to rural quality of life and peace of mind issues are not discussed adequately.

The noise level analysis uses improper baseline condition and this gets back once again to the issue of the failure to perform a programmatic NEPA document looking at the effects from AF flights paths as a whole on the environment. Additionally the noise analysis uses averages when in fact the majority of severe disturbances to humans, animals, communities, and wildlife will likely come from specific events falling outside the average. The certainty that these do and will occur and their environmental effects are omitted from the DEIS. For example a low elevation supersonic flight accidental or otherwise and a the resultant sonic boom that may ensue, aberrant pilots flying off-course, the potential for psychologically disturbed German or American pilots engaging in activities which do not fall within the averages. Averages are ameliorative to the analysis and do not get at actual likely, possible or reasonably foreseeable events.

The DEIS ignores secondary community effects such as rural quality of life degradation from increased overflights and from overflights as a whole. The DEIS ignores people's feeling of alarm, discomfort, unease and environmental degradation at the German Air Force flying low altitude training flights over their homes and communities in aircraft possibly armed with live bombs, potentially even nuclear weapons. Certain community members including veterans of WWII, those who lost family in WWII, members of the Jewish faith-race, and those who are fearful of Germany or U.S. military involvement in multi-lateral organizations like NATO or the United Nations. NEPA case law and regulations are clear that once the NEPA process has commenced that secondary community effects must be addressed.

The DEIS does not discuss what important issues were raised during scoping, which ones would be considered in detail or excluded from analysis and why. A transcript of the public hearings and any letters written regarding scoping should be appended to the FEIS.

The issues of fuel-spills from aerial "buddy-buddy" re-fueling is not addressed.

The issue of air quality and health issues from jet operation and un-vaporized fuel misting/falling into the ambient environment is not addressed.

In the actions considered for cumulative effects section only changes in AF operations up to the year 2000 are included and non-military impacts to the areas affected by the proposal are virtually entirely omitted.

The DEIS fails to accurately assess impacts of noise on the rural human environment, Many people

choose to live in rural areas because of the solitude, quietness and tranquility it offers. The DEIS fails to accurately describe areas underlying some of the flight paths as extremely wild areas with the opportunity for outstanding solitude. The averages used and the noise contours aggregate effects and fail to provide an accurate picture of the actual effects to the human environment from low-level military overflights in the area from this action and cumulatively when taking into account other military flights and other disturbances.

W-222

The sections on Irreversible and Irrecoverable Commitment of Resources, Adverse Environmental Effects Which Cannot Be Avoided and the Relationship Between Short-Term Uses of the Environment and Long-Term Productivity are grossly deficient.

The noise analysis concludes that a certain percentage of people will be perpetually highly annoyed or annoyed as a result of noise increases, this is omitted from this important conclusory section. The likely actions of those highly annoyed individuals on worker productivity, domestic violence and community stability must be addressed. The potential loss of the ability to re-introduce the highly endangered California Condor is omitted as is the potential of disturbance or loss of New Mexico's only producing desert nesting bald eagle. Recreation users loss of solitude in wilderness area is also not disclosed nor is disturbance to users at Bosque Del Apache NWR. Another effect not disclosed is that the more German facilities are brought to Holloman AFB the greater the likelihood that future German "needs" will be met by future expansions of Holloman AFB much in the same manner as how the previous allocation of resources made Holloman AFB the only "logical" (to the AF) choice for placement of this expansion.

W-223

W-224

W-225

W-226

The proposed action will violate the Wilderness Act by reducing the opportunities for solitude within wilderness areas and Wilderness Study Areas (WSA's)

W-227

The proposed action flies over the Gila Wilderness and other wilderness areas, the EIS mentions that many of these areas are Class I airsheds, yet makes no mention of how these flights when combined with other actions will affect Class I airsheds.

W-228

The analysis for emissions uses pollutants from airplane figures but fails to calculate these figures using military jet fuel which contains and emits more pollutants than more commercial aviation fuel

W-229

The action will violate the Migratory Bird Treaty Act (MBTA). The DEIS indicates that Bird Aircraft Strike Hazard (BASH) incidents involving songbirds at least occur near Holloman AFB. German planes will undoubtedly create BASH incidents involving MBTA protected species. This unpermitted mortalities will violate MBTA.

W-230

The DEIS usage of averages for the purposes of assessing noise impacts skews the analysis away from disclosure of some of the more severe environmental consequences associated with the DEIS. The analysis should look at an analyze likely and reasonably foreseeable aberrations from that the averages used.

W-231

Page 4-45 discusses cumulative effects, discloses adverse effects yet these adverse effects are omitted from the unavoidable adverse effects section.

W-232

Page 4-73's discussion of overflight impacts to birds and wildlife is grossly deficient and so selectively referenced to cause us to ask for a complete re-analysis of the project with a different more competent environmental consulting firm if this project is to proceed. The assumptions made that impacts will be negligible over current levels does not address the larger question the cumulative issue of what is the cumulative effect of the overflights, not the effect of an incremental addition, but the overall picture, the picture that the USAF is trying so hard not to analyze, disclose or see. Page 4-74 concludes "Projected utilization in these areas is not significantly different from existing levels; it is unlikely that the proposed change in utilization would result in a significant increase in response by wildlife." This statement completely evades the question what the total effect of the overflights on wildlife? By attempting to always segment and piecemeal analysis the AF can always assure itself that impacts will appear to be minor. This "ramp-up" ad-nauseam strategy violates NEPA's mandate for full disclosure and fully-informed decision making.

W-233

This section is grossly selectively referenced. A number of studies have concluded that overflights may or do negatively affect short-and long term wildlife productivity exist. Curiously only those studies which appear to buffet the AF's contentions appear to have made into the analysis for this project. Raptors and Aircraft (Smith et. Al. 1986) in the Proceeding from the Southwest Raptor Management Symposium and Workshop (Institute for Wildlife Research-NWF)

W-234

The study discusses issues such as increased bird ingestion into aircraft with large jet engines, raptor strikes causing engine malfunction, accidents. The study states that most military bird strikes and interactions occur "during low-level training missions". The study states "Raptor responses to aircraft during the breeding season may have no immediate negative impact on survival of eggs and young but may increase overall physiological stress and ultimately decrease reproduction over several nesting seasons...Although short-term responses are more often easily observed and may have no apparent impact on the survival of the eggs and young, long-term responses may have greater negative consequences by limiting the reproduction or survival of a raptor population. In addition it should be noted that long-term effects have not been well-studied and thus are poorly understood" The study also notes that "Studies of nesting bald eagles by D. Haywood and R. Ohmart (unpubl. data) and T. Grubb (pers. comm.), however, revealed that aircraft especially jets, were the most frequent type of potentially disturbing human activity around Arizona bald eagle nests...The study discusses territory abandonment or declining site productivity as possible results from low level flights. Additionally both Stalmaster and Bio Systems inc. have written regarding analysis and examples of disturbance to bald eagles from low-level aircraft.

W-235

Impacts to Mexican Spotted Owls, Peregrine Falcons, Golden Eagles, Whooping Cranes, Bighorn Sheep, Antelope and other species are not adequately addressed.

Potential disruption of archeological sites is inadequately assessed partly by using averages.

WJ-236 [Potential damage to structures at Gila Cliff Dwellings National Monument and other archeological sites is not adequately addressed.]

WJ-237 [A listing of agency or public complaints and actions taken regarding low-level military aircraft in the past twenty years in the Southwest should be included and discussed in the EIS to get a better idea of expected aberrations from the unrealistic averages employed by the AF for the EIS analysis.]

Please send us a copy of all previous NEPA documents conducted regarding Holloman AFB and/or the Holloman AFB Aerodrome. Please be sure to include any/all NEPA documents regarding all past German military expansion.

WJ-238 [A programmatic EIS must be conducted for the environmental effects of the flight-routes. The AF "ramp-up" strategy never allows the public full disclosure nor allows the decision maker to fully understand the environmental consequences of their actions.]

WJ-239 [Please disclose whether nuclear materials and missiles will be flown on the flight paths.]

WJ-240 [Please disclose whether live bombs or other ordnance will be used in the overflights and discuss accidental bombing and aircraft crash incidents which are reasonably foreseeable or which have occurred recently.]

WJ-241 [The noise level analysis is completely skewed, using averages failing to account for the fact that the overflights go over what would be some of the quietest terrain in North America in the absence of such military overflights. The noise analysis states they will use the same noise criteria be used for wildlife as for humans which is ridiculous given that many wildlife species have hearing far more sensitive than humans. The noise analysis misses any significant potential effects to wildlife including raptors, protected species and Mexican Wolves (which have very sensitive hearing and could be potentially deafened by overflights) Bighorn Sheep, Antelope and numerous species.]

Please be sure to send us a copy of all materials requested as well a copy of the FEIS and ROD when it is prepared.

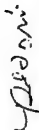
WJ-244 [The DEIS fails to note when the NOI was published in the Federal Register.]

WJ-245 [The DEIS states that the purpose is to meet bi-lateral needs to supply Germany with training routes and facilities, yet it appears as though the U.S. Government is putting \$40 million dollars of taxpayer money into the project and that U.S. planes usage will increase as a result of this NEPA document. If so than the purpose and need are violated and if not why is the U.S. Government spending \$40 million on facilitating German military expansions in the U.S.?

Thank you for your consideration of our comments and for our request for an extension to the

comment period.

Sincerely,



Peter Galvin
Conservation Biologist

5 August 1997

3 August 1997

CERT MAIL: P 757 482 702

RETURN RECEIPT

U.S. Air Force
HQTRS Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

Re: Draft Environmental Impact Statement: PROPOSED EXPANSION
OF GERMAN AIR FORCE OPERATIONS AT HOLLOMAN AFB, NEW MEXICO

Ms. Sheryl Parker
HQTRS Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

Re: Draft Environmental Impact Statement: PROPOSED EXPANSION
OF GERMAN AIR FORCE OPERATIONS AT HOLLOMAN AFB, NEW
MEXICO

Dear Ms. Parker:

Enclosed is a corrected edition of my previously
submitted letter of comments regarding above subject matter
mailed to you by CERTIFIED MAIL. This should explain more
clearly my statements and correct my previous mistakes in
descriptions. Thank you.

Encl

Sincerely yours,

A S Elliott
A. S. Elliott
HCR 32, Box 25
Uvalde, TX 78801

97DEIS-2.DOC

TO WHOM IT SHOULD CONCERN:

I attended the Ft. Sumner, New Mexico, community meeting
on 10 July 1997, and submit this written response in addition
to my spoken disapproval of the above planned operation.

Isn't it ironic that we have invited the German Air Force
to relocate and train on and over the same lands that were
given-up and confiscated for the World War II training effort
and promised to be returned to the ranchers and permit holders
at war's end? And, after some 50 years, the land still hasn't
been adequately or entirely paid for or returned? This fact
is omitted from the BACKGROUND, page 1-1.

I have been subjected to over 17 years condemnation of
reasonable airspace over my 100% deeded ranch and situated in
Central DeBaca County, New Mexico. Yes, I have met with
various personnel of USAF, US Congress, FBI, and attorneys,
and, yet I still have to file damage claims for damages paid
for by our US Treasury, but, not admitted to by the Air Force.
My personal and my property rights have been reduced because I
live "in a sparsely populated primarily agricultural
producing area..." and my disturbance is deemed "minimal" by
FAA, USAF, and HSP proposals versus flying over more populated
areas such as cities. (ppES-4.5)

I am also concerned with the continuing mid-air close
encounters with high flying commercial airlines. The latest,
last week, by F-16s from Luke AFB, AZ, within 400 yards of
 mishap. The USAF appears to be never happy to stay within
their assigned operating MOAs and altitudes.

After extensive review of the DEIS, I ask these questions
or offer these omissions:

There is no discussion on private land archaeological
discovery or disturbance for above ground structures, re: page
ES-1.
There is no discussion on use of evasive action areas at
low altitudes during, but not limited to, dry drought, grass
conditions prevalent in New Mexico; re: SAFETY, p ES-1-1.

W-246

W-247

W-248 3. I wish you would restrict your supersonic flights to WSMR and Alamogordo, NM., re: Para. 2.1.1, p. 2-2. I experience about one per week under the PECOS MOA.

W-249 4. Though MTR VR 1198/1107 is not consistently mentioned, low level flights at 100-300' AGL by various units of aircraft are not appreciated despite years of broken promises and agreements and establishment of NSAs; re: Low-altitude navigation... p. 2-11. See my Exhibit 1.

W-250 5. Phase I Screening, p. 2-14: a) Figure 2.1-4, Why was Ft. Sumner Municipal Airport "excluded"? b) Fig 2.1-7, Why is area east, northeast, southeast of Roswell "excluded area"? c) p. 2-12, second paragraph. Why are such criteria applied when Germany and Bosnia do not meet this criteria? Are all wars, excuse me, police action, committed to flat to gently sloping elevation countries?

W-251 6. Tables 2.1-6, 7, 9, 10, 12, 14 all show the most sorties in the PECOS LOW MOA and F.3-5, 3.1.2.3, "...use of Pecos Low MOA will increase from about 7 to 17 sorties a day." (an increase of 150%) We don't need any additional aggravation.

W-252 7. Noise and Land Use, Table 2.4-1, pp. 55-58. There needs to be an actual physical study to determine the real disturbance and complaints and claims filed. Do you know how many are filed each year? the last 5 years? the last 10?

W-253 8. Socioeconomics, Table 2.4-1, p. 2-64, under Existing Range Option, that is a false statement: "No impacts to regional socioeconomic attributes." I continue to suffer disturbance and damages.

W-254 9. On p. 3-1, EXISTING ENVIRONMENT, the ineptness of the FAR or just plain disregard allowed MTR VR1198/1107 to be established over my corrals, house, etc., qualified under the NEPA allowance of 193 sorties of various US aircraft. This continues with conflicts with FARs requiring a 500' vertical and horizontal separation, but, allows for 100' AGL routes over people and houses. 2. the routes are allowed "from surface to F180". This excuse or justification? We just didn't see yet." See Exhibit 1.

W-255 10. 3.3 LAND USE, p. 3-21, no mention of private land.

W-256 11. On page 3-21, 3.9.2. Low-income and Minority Populations: Why is this even mentioned? What does it have to do with this proposal?

W-257 12. 4.2 NOISE, p. 4-5, Your "Noise Averaging" is a farce! Come out into the country and experience it and measure it! Numerous tables under this section depict the excessive noise levels for the Pecos MOA. Concluding with "...isolated residences... and underlying rural areas in Debaca... counties would experience the greatest cumulative changes and potential doubling of overflights over 1995 conditions." This, people is not acceptable! See Exhibit 3.

W-258 13. App C, Fig C-1, p. C-5: Why weren't aircraft noises included with other common noises for a seemingly valid comparison? I feel you pulling my leg on that table.

W-259 14. C.2.6, Noise Effects... You should research complaints and claims filed.

15. Livestock, F.3-6, re: inadequate studies, you should research at 100' AGL and include the E-1B bomber.

In conclusion, it has been a pain to play the game of co-existing with Air Force operations. They make agreements then break them without notice. Or, if I retain prior violations in an agreement, they decide to not agree. See Exhibit 3. Or, to settle a claim, one must submit an explanation to some dimwit lawyer back east. See Exhibit 4.

Or when I must request my US Senator to help me resolve the abuse and the Secretary of the Air Force requests a chronology of my complaints. By convenience, the most damning incidents are omitted-Isn't that fraud? Yes, I have copies of coinciding correspondence. When the Air Force has no defense for it's violations, it becomes offensive! It sickens the FBI onto me to intimidate and scare me into submission.

And, when questions arise as to why F-15s go vertical over my house, a different explanation is offered as to why they weren't there! See exhibit 5.

And then there is the war on mock SAM sites scattered over Debaca County, GEOROS (or similar acronym) and television reception is disturbed. After condemning my primitive antenna suffering from wake turbulence and country winds, they do admit that "...the signal was interrupted momentarily by the physical body of the aircraft directly in path of the signal." And I have pictures to confirm that it's more than just momentarily. See Exhibit 6.

I could offer up more correspondence and pictures... is anyone listening? Hell no, we don't need the German Air Force and their additional assistance included with it. See Exhibit 7.

Sincerely yours,

A. S. Elliott
A. S. Elliott
HCR 22, Box 25
Uvalde, TX 78801

Encs

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HEADQUARTERS 150TH TACTICAL FIGHTER GROUP

NEW MEXICO AIR NATIONAL GUARD
110104 5510 NINTLAND AFB, NEW MEXICO 81185

REPLY TO
ATTN OF

CC
SUBJECT Letter of Understanding

Mr. A.S. Elliott

1. Attached are three copies of the agreement reached during our 2 Mar 82 meeting in Ft. Sumner. Please review them and sign if you concur. Return two signed copies to me and I will forward one to Gen Hites for his records.

2. If you do not concur with the agreement, please contact me personally at 505-814-1361.

David L. Quinlan
DAVID L. QUINLAN, Col, INMAG
Commander

1 attach: letter and map (3 copies)

THE ORIGINAL, WITH, AMENDMENT WAS
RETURNED SIGNED TO COL QUINLAN.
HE DID NOT LIKE MY AMENDMENT
SO HE FAILED TO ACKNOWLEDGE THE SAME
SEE 7 APRIL 82 COPY.

EXHIBIT 1

HEADQUARTERS 150TH TACTICAL FIGHTER GROUP

NEW MEXICO AIR NATIONAL GUARD
110104 5510 NINTLAND AFB, NEW MEXICO 81185

Letter of Understanding

3 Mar 82

1. As a result of the meeting between MG Franklin E. Miles, Mr. A.S. Elliott and Col David L. Quinlan in Ft. Sumner, NM, on March 2, 1982, the following restriction to the use of VR-198/1107 was agreed upon.

2. The area bounded by N 34°30'00", W 104°27'30" to N 34°30'00", W 104°21'00" to N 34°16'00", W 104°21'00" to N 34°16'00", W 104°27'30" is closed to aircraft flying below 1500 feet above ground level (AGL).

3. The attached aeronautical chart depicts the area defined in paragraph 2. *QUINLAN*

4. The undersigned have read this letter and agree to its provisions. *NCT MIE*

David L. Quinlan
DAVID L. QUINLAN, Col, INMAG
Commander

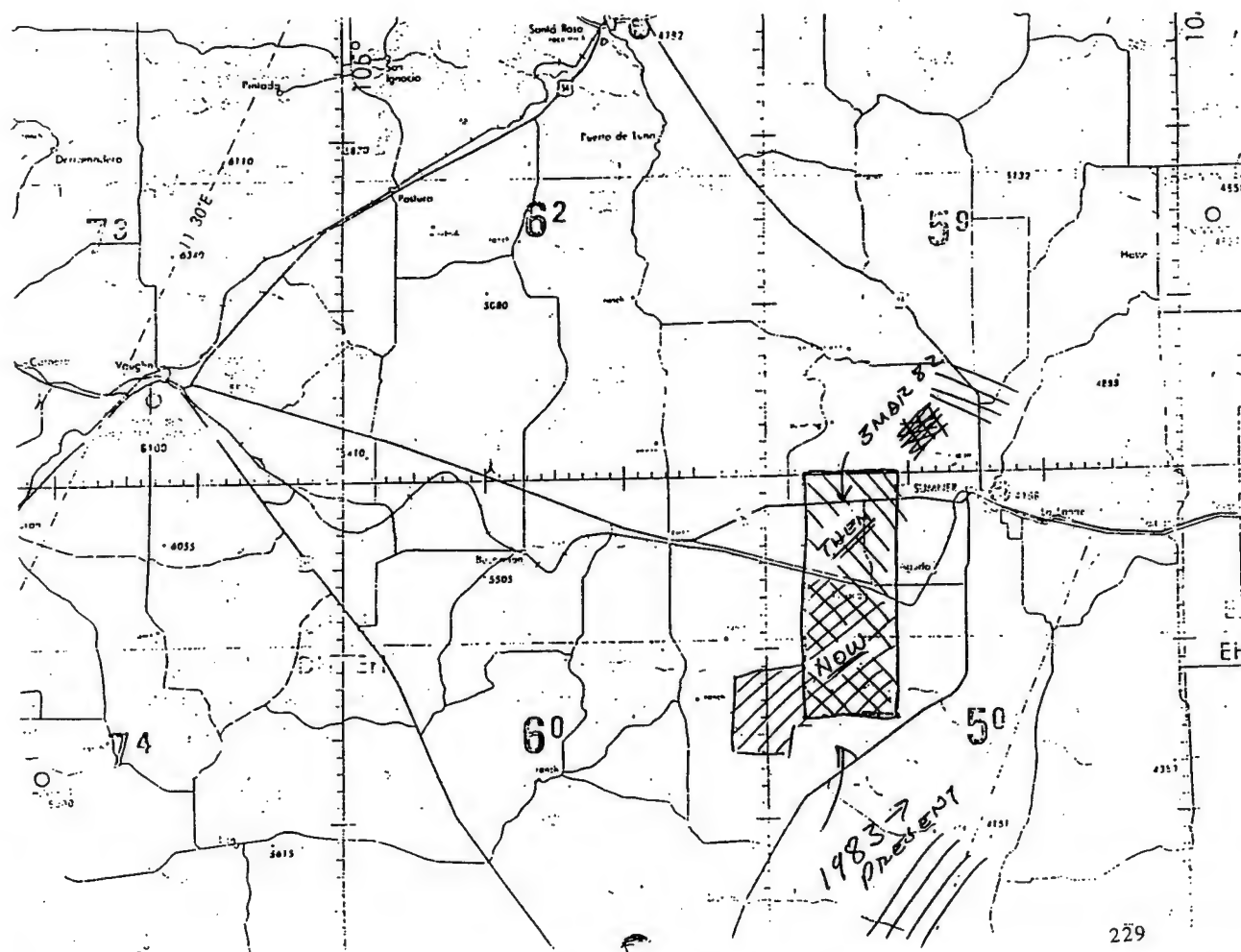
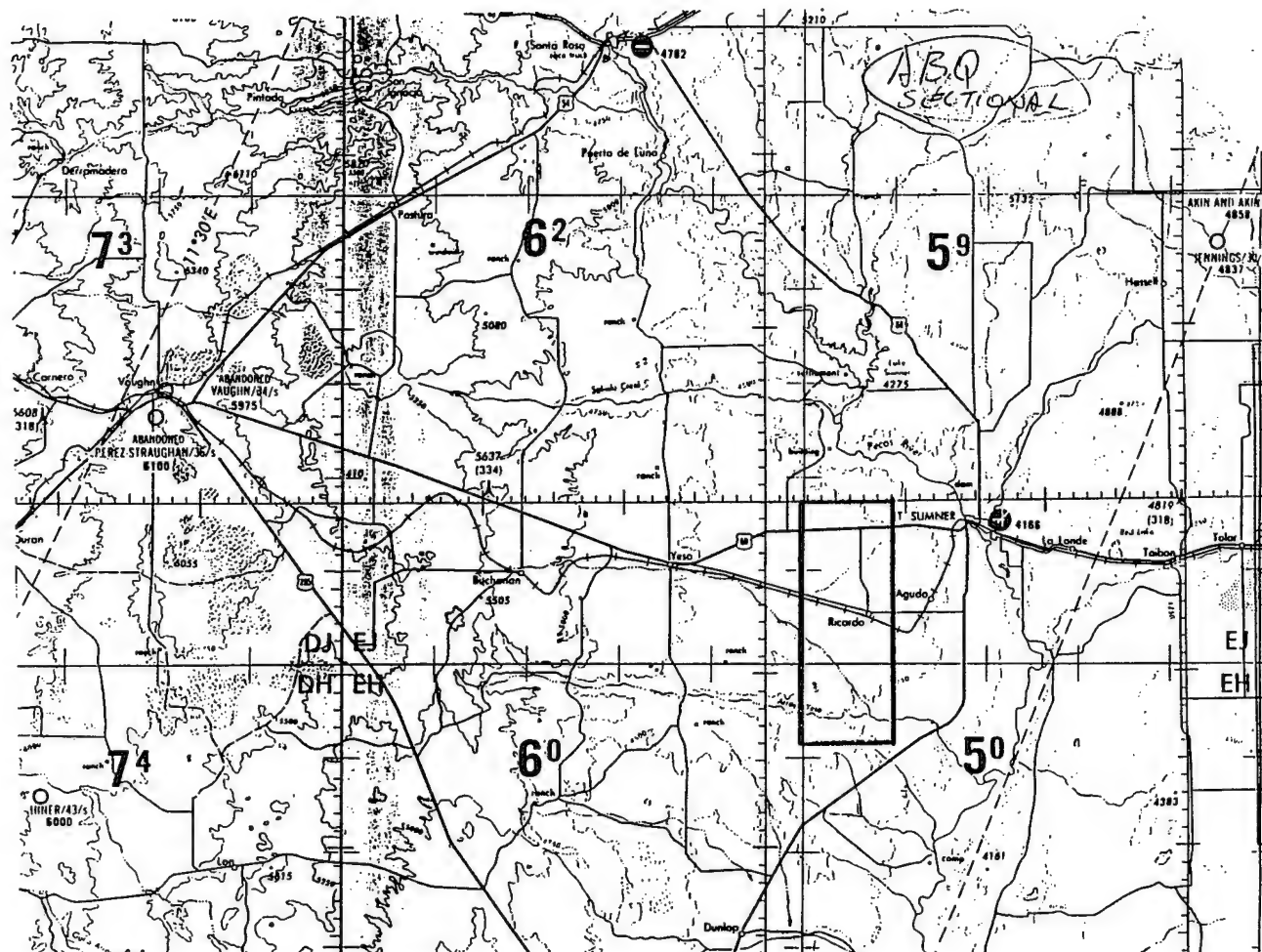
A.S. ELLIOTT

The undersigned acknowledges that A. S. Elliott by affixing his signature hereto is not waiving any rights that he might otherwise have if he determines in the future that the flyers of military aircraft are continuing to interfere with A. S. Elliott's operation of his ranch or ability to enjoy relative peaceful and quiet conditions at or about his home.

A.S. Elliott

A.S. ELLIOTT

MY AMENDMENT





HEADQUARTERS 150TH TACTICAL FIGHTER GROUP
NEW MEXICO AIR NATIONAL GUARD
P O BOX 5510, KIRTLAND AFB, NEW MEXICO 87185

7 Apr 82

REPLY TO
ATTN: OPI

CC

SUBJECT: Revisions to Letter of Understanding

TO: Mr. A.S. Elliott

1. With reference to your additions to the proposed Letter of Understanding dated 3 March 82, I feel that the following comments are appropriate.
2. I have included the words "all military aircraft," but must again emphasize that the New Mexico Air National Guard can only control the use of VR-198/1107. Aircraft belonging to other units or services may transit the area at low altitudes without coordination with us, and thus may not be aware of the route restriction. Such flights would not necessarily be improper, depending on the speed of the aircraft involved.
3. Your additional statement at the bottom of the letter frankly surprised me. I was under the impression that our meeting in Ft. Sumner on March 2, 1982, was an effort to resolve the issues at hand without resorting to legal avenues. Your added comments appear to me to have legal implications, and I ask you to reconsider the requirement for such a statement. If, however, you feel that such a comment is necessary in a letter of mutual understanding, then I must recommend to General Miles that further discussions be accomplished between legal representatives of each party.
4. Attached are three copies of a revised agreement. If you concur, please sign them and return two copies to me. I will forward one copy to Gen Miles for his records.

David L. Quinlan
DAVID L. QUINLAN, Col, INMANG
Commander

1 atch: letter and maps (3 copies)



HEADQUARTERS 150TH TACTICAL FIGHTER GROUP
NEW MEXICO AIR NATIONAL GUARD
P O BOX 5510, KIRTLAND AFB, NEW MEXICO 87185

7 Apr 82

REPLY TO
ATTN: OPI

CC

SUBJECT: Revisions to Letter of Understanding

TO: Mr. A.S. Elliott

1. With reference to your additions to the proposed Letter of Understanding dated 3 March 82, I feel that the following comments are appropriate.
2. I have included the words "all military aircraft," but must again emphasize that the New Mexico Air National Guard can only control the use of VR-198/1107. Aircraft belonging to other units or services may transit the area at low altitudes without coordination with us, and thus may not be aware of the route restriction. Such flights would not necessarily be improper, depending on the speed of the aircraft involved.
3. Your additional statement at the bottom of the letter frankly surprised me. I was under the impression that our meeting in Ft. Sumner on March 2, 1982, was an effort to resolve the issues at hand without resorting to legal avenues. Your added comments appear to me to have legal implications, and I ask you to reconsider the requirement for such a statement. If, however, you feel that such a comment is necessary in a letter of mutual understanding, then I must recommend to General Miles that further discussions be accomplished between legal representatives of each party.
4. Attached are three copies of a revised agreement. If you concur, please sign them and return two copies to me. I will forward one copy to Gen Miles for his records.

David L. Quinlan
DAVID L. QUINLAN, Col, INMANG
Commander

1 atch: letter and maps (3 copies)

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, D.C.

EXHIBIT 2

13 FEB 1987

Mr A.S. "Tex" Elliott
P.O. Box 58
Fort Sumner, NM 88119

Dear Mr Elliott

Your letter of 18 Dec 86 was referred to this office for response. I have reviewed the last six years' correspondence and negotiations concerning low-level flying close to your residence. I understand and share your concern.

Federal Air Regulation 91.79 and Air Force Regulation 60-16, General Flight Rules, paragraph 5-9d state, "Except for takeoff and landing, pilots do not fly aircraft over non congested areas at an altitude of less than 500 feet above the surface - except over water or sparsely populated areas. Under such circumstances do not operate aircraft closer than 500 feet to any person, vehicle, or structure." As depicted on the enclosed map, Visual Routes (VR) 1107 and 1195, which provide our pilots low-level training at 100 to 1500 feet above the surface, overfly your area, which is categorized as "sparsely populated." This means pilots must avoid any person, vehicle, or structure in your area by at least 500 feet. In response to your complaints, the Air Force established special operating procedures which direct pilots to stay well clear of your residence. The procedures are listed in the DOD Flight Information Publication as follows:

- a. Avoid 34-20.0N 104-23.75W by two nautical miles.
- b. Flight below 1500ft above ground level is not authorized in that area bounded by a line from 34-31N 104-28W to 34-31N 104-29W to 34-15N 104-20W to 34-15N 104-28.5W to point of beginning (outlined on map).

I am working with Tactical Air Command representatives to ensure their crews adhere to the restrictions. I assure you that the United States Air Force is attentive to responsible use of airspace and the environment. The public's wishes are a prime consideration when planning our day-to-day operations.

If I can be of further assistance please contact me at 202-697-4399.

Sincerely

Robert B. Nicholson
ROBERT B. NICHOLSON, Col, USAF
Chief, Airspace and ATS Division
Directorate of Operations

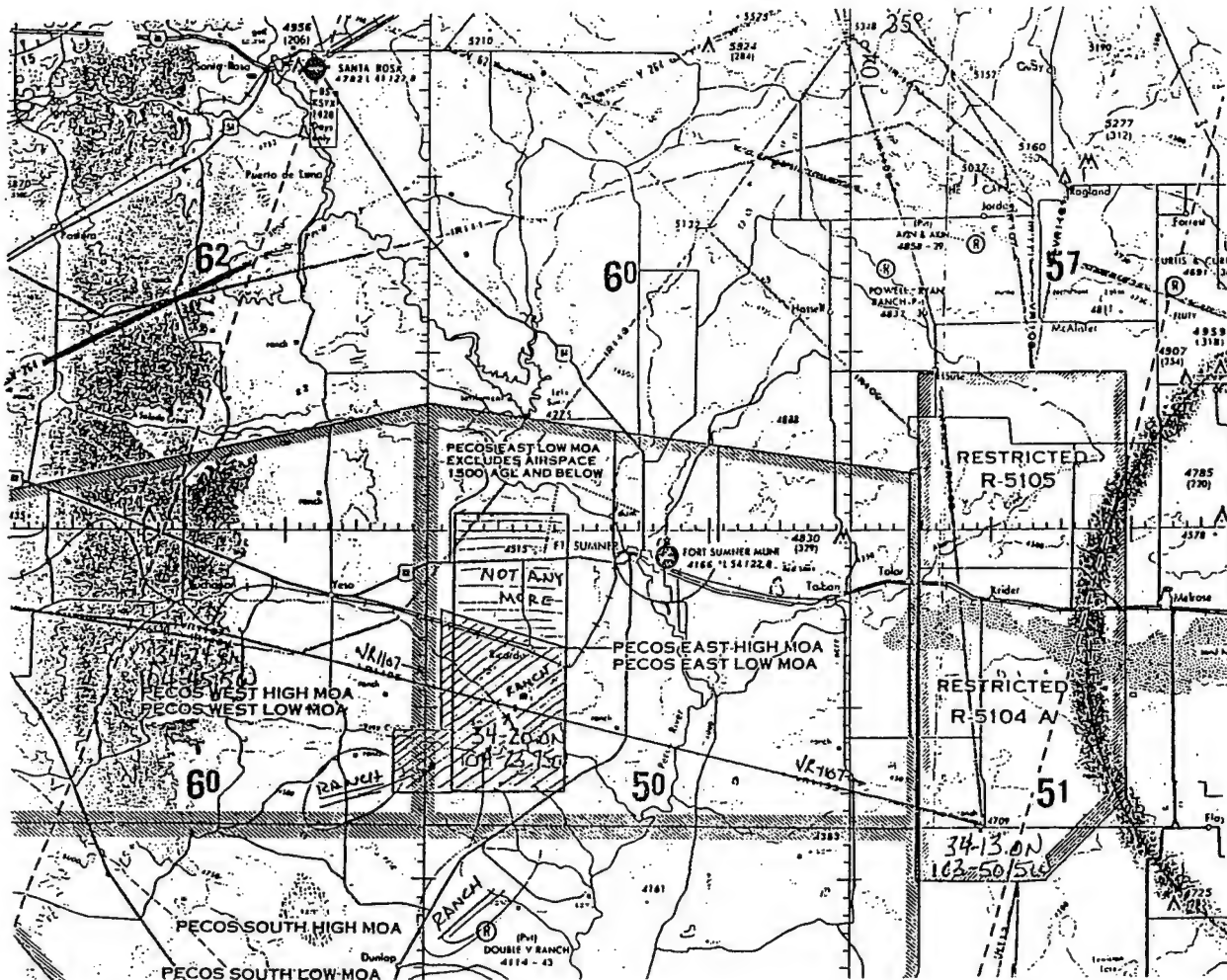


EXHIBIT 4

A2

EL BIGOTE CATTLE CO.

A.S. "TEX" ELLIOTT
P.O. BOX 58 OF DUNLAP ROUTE
FORT SUMNER, NEW MEXICO 88119
505 355-7467

CERTIFIED MAIL: 2 034 670 189 11 December, 1994

Eugene J. Kirschbaum, Major, USAF
AFISA/JACT
1501 Wilson Boulevard, Room 815
Arlington, Virginia 22209-2403

Re: Continuing USAF Damage Claims/ Violations FAR's

Dear Maj. Kirschbaum:

I will attempt to answer your questions in spite of the military mindset, and lack of communication. Bear in mind, though, that you have until 15 DEC 94, to settle this DEC 93 claim (re: letter to LtCol Chostner, Cannon AFB, CERT MAIL, 27 NOV 94). Otherwise, I will re-compute my damages to include interest lost, attorneys fees, etc.

I have been a partner, then a sole proprietor, of my ranch property in DeBaca County, New Mexico, since 1961. The partnership terminated in December, 1974, and the ranch was partitioned effective 31 OCT 78. The next year, 1979, I started to be buzzed by NMANG A-7's, and a few other aircraft. Since we had split up the ranch, I had to re-locate my headquarters for my personal operation. I chose a pre-existing corrals location that had been used by various owners for some 40-50 years previously. I built a 55'x 75'x 16' metal barn (quite a landmark, or pilot reference point!) and set a 24'x56' mobile home at the site. In 1973, I had set a 8'x20' vertical molasses storage tank next to the corrals. A lot of reference points on a primarily flat pasture land.

That spring, 1979, while we were branding our calves using a butane gas branding iron heater, two flights of NMANG A-7's came right over the pens. I and everyone else scattered to avoid a potential gas explosion fearing the gasoline had busted and ran gas was about to explode. Two A-7 aircraft passed right over us at 100'AGL, or less, followed by two more A-7's, same altitude. Now, Sir (yes, Sir, as I was in the military too, USAF Field Artillery, so I know my vertical distances.), with all the dust from the cows and calves milling around, the smoke from the burning hair and hide, all the numerous trucks and trailers, the corrals, and barn, just why did the 150thTFG, now 150thFG, have to fly right over us? I called in the complaint and continue to call in complaints for blatant violations of FAR's for fifteen (15) years. Why???

After several years of voicing my complaints by radio-telephone (we didn't get a telephone until 1986), telephone, and by mail, I discovered that the USAF, FAA, and the NMANG, had created XVR 165, later to become, currently, MTR VR 1198/1107. No one ever contacted me, nor did anyone contact the local newspaper, The DeBaca County News, to advertise their intentions. It was later disclosed that the Eastern Plains Council of Governments was notified, so what? The EPCOG has no jurisdiction in what the USAF/ NMANG is doing to the people! Consequently, we, I, was never aware that the route was planned and approved and flown. Yes, the route goes right over my headquarters complex; the storage tank, the barn, an overhead feedbin, and my house, the centerline of a 26km wide low-level jet training route, VR 1198/1107. I complained, and the NMANG continued to overfly my house, personnel, and livestock. But, Sir, they "...were never there, were never that low, or were never that close." I began to take pictures and the war went on.

Soon, the F-111's started to overfly my house in the same directions, back and forth. My first written correspondence in this regard was to the "Office of the Air Force Representative, FAA Southwest Region, Ft. Worth, Texas," William M. Whorton, LtCol, USAF, in SEP 80. His reply is dated 25 SEP 1980. At that time, he enclosed an Albuquerque Sectional map, and asked me to locate my "residence" and include my pictures. I promptly replied on 29 SEP 1980 with a map that Capt Bill White had furnished me previously. The overflights continued and I made my first personal trip to the operations center on Cannon AFB, Clovis, New Mexico. And, guess what? They had my ranch location down by Elida, New Mexico, some 40-50 mile away! I was not impressed. I continued to call in my complaints of noise and proximity violations.

I believe it was some LtCol from Cannon that decided to come see me with a Charlotte Farkas (I believe that's right.). Public Affairs, 27TFW. She brought me a strobe light to place upon my feed truck, or whatever other truck I might be driving! She plugged it in, and it promptly quit working! So much for marking my vehicle. But, before they got here to my house, I noticed a F-111 circling my location at 1000'AGL. Yessir, the old boy couldn't find my house on the map! He had the pilot of the F-111 continue to circle my house so that he could get here on a county road. Again, I was not impressed.

The overflights continued by both agencies; 150thTFG and 27 TFW. The phone calls and letters continued. They continually denied flying so low and so close, yet, I now had pictures. I reported a flight of four A-7's north of my house within the avoidance area one day and heard later that one NMANG pilot "had bought the farm" that same day. Guess what? Yes, the same hogs that I reported! They denied being closer than 8km north of my house. I invited the Commandant as well as the Adjutant General, MajGen Franklin Miles, to sit on my front porch, have their hogs fly 2km away and see if they could ID them. They never made it.

Instead, Col David L. Quinlan, Commander 150TFG, and ADJ GEN Miles came down to Fort Sumner, and we met at a local cafe. I pleaded my case, showed my pictures, reminded them of their pilot's denials, and asked to create a no-fly boundary around my ranch property. They went home and Col Quinlan sent me an agreement on 3 MAR 82. I signed it and added that this agreement was not to forgive all previous violations of FAR's, and returned it. Col Quinlan was not happy with my addendum, and sent me another copy of the original dated 7 APR 82. Did we have an agreement, or not? They agreed not to overfly, but, the harassment continued. The correspondence continued with the assistance of an attorney.

I finally secured some, but not all, copies of the planning of the VR 119R/1107 route. The environmental assessment was about 190 sorties over the route, 26nm wide, sometime back in 1978-79, and that was it: no disturbance to the environment! What a crock of CA-GAI. My attorney set up meetings with the NMANG but, they backed out, wouldn't meet. Same old denials, same old songs.

I finally received some consolation on 13 FEB 87 from Col Robert B. Nicholson, USAF, Chief, Airspace and ATS Division, Directorate of Operations, Department of the Air Force, Headquarters United States Air Force, Washington, D.C. He referred to "FAR 91.79 and AF Regulation 60-16, General Flight Rules, para. 5-9d..." His response listed in DOD Flight Information Publication was: a. Avoid my coordinates 34-20.0 N, 104-23.75 W, by 2nm and b. Flight below 1500'agl is not authorized in that area by describing my approximate ranch boundary by more coordinates. I corrected his map, evidently mail, advised him of my shooting some doubt, and by certified mail, advised him of my shooting range within the same coordinates. To date, this advisement has not been rescinded by me. But, it has gotten the NM Adj Gen of en several times. I reported one incident to the NM Adj Gen of en A-7 overflight, #313 tail number, that occurred just after I had shot a coyote over the same rise in terrain. What a surprise for both of us!

I cautioned both the AF and NMANG about their surprising pop-ups over the hills and valleys, and that they could be hit. Now, Sir, "could" denotes both a possibility as well as a probability. They continued to threaten me with the FBI, so, I took the initiative and made a personal visit to Agent Les Venette, Clovis, NM. I showed him my pictures as well as my correspondence. He expressed his sympathy and cautioned me of my predicament. I told him it was my disclosure and my liability release for a possible nasty accident. I have also spoken with Agent John Schum, ABQ, FBI.

I then felt somewhat secure in all of my efforts to have the military not to buzz my house and person. But, again, the abuse and the denials continued. Out of disgust for the continuing decline of the Fort Sumner School system, and another opportunity to return to Texas, we did so the summer of 1987.

I leased out part of my ranch operation and I retained a third. On several visits back out to New Mexico, I experienced the same low overflights, called them in, and told the "hired hand" to also report the 100'agl flights over the house. But, didn't we have an agreement not to so low overfly the house by both the USAF and NMANG? I believed so, but, evidently, I was the only one that so believed. The abuse continued; same old songs, the umpteenth verse.

Now comes the EIS for the expansion of the 27thFW, the expansion of Melrose Bombing Range, and the creation of Mt. Dora MOA in north-eastern New Mexico. I continued to subscribe to the weekly DeBeau County News all the while I was in Texas. Never, repeat: NEVER was there a notice of the Draft Portion of the EIS. I found out of it later, but, I had an agreement with the United States Air Force not to harass me didn't I? But, wait---there is more. The only notice to advise the county population of the EIS was the notice that the "deal was done", it's history, the FINAL EIS was approved. The "primarily rural population will suffer only a minimal disturbance" from the increased based aircraft and number of sorties to be flown. So many wrongful assumptions, but, when you're not invited to respond, what could we, I, have done? But, I had two agreements...

So, I checked-out the final copy from the Fort Sumner public library and began to read. Damn, did we get screwed!! Several other counties, so consequently, other ranchers were not advised as to what was to be condemned of their reasonable airspace over their ranch operations. Boy, did we get the short stick! And yes, we were omitted from having a say on what was to become a detriment to our peace of mind as well as our economic operation. Sir, the EIS is a scam, a sham, and a screw job to the population that lives and operates below the PECOS MOA's and MT DORA MOA.

How did I get screwed? Let me explain. After continuing to call in complaints by both the USAF and NMANG, I suffered my first undeniable damage by the F-111's. The claim that you now question, 22-24 DEC 93. We heard and saw the suspected aircraft flying over my just weaned 93 year calves. We would patch fence and re-gather both calves and cows as the calves escaped the herd trap and the cows entered the trap looking for their separated calves-two jobs: get the calves back in, get the cows back out. The F-111's continued to overfly as we patched fence and as we cowboied the livestock back to where they were supposed to be. Night and day for several days. What happened to my Christmas vacation and visit with my family? Yes, I was batchin' out here on the ranch while my family continues to live in Uvalde, Texas.

We had tickets to the Christmas Eve John Hancock Bowl football game in El Paso, Texas, to watch my alma mater Texas Tech play Oklahoma University. Because of the continuous inconsideration of Cannon AFB personnel and their low flights over my livestock, I could not attend the game with my family and my wife's sister's

family. I was fixing fence the afternoon of 23 DEC 93 in the snow when my family drove off for El Paso. I did not feel secure to leave and suffer more damage by low flying jet aircraft exciting my calves causing them to run through the fence again and having to go to that same at that time with the mini-family reunion. That Sir, is my damage of \$500.00, US, that you question.

I have never, repeat NEVER, asked for compensation for the tickets that my family used to attend the game! Didn't Cannon Public Affairs, or LtCol Chostner, send you a copy of my claim on SF 95? You speak of numbers I claimed, but, you cannot read the original form? Where does it state that I want consideration for tickets and hotel rooms? Where is it? A Mr. Jim Bryant, civilian, claims agent requested proof that my family, or I, had made plans or were ever in El Paso. So, ... I sent the credit card receipt that just happened to contain the computation for the trade-out payment for the tickets; the brother-in-law bought the tickets, my wife paid for the motel. Plain and simple!! This is why I feel I have a hard time dealing with "you folks". Miscommunication. The first SETTLEMENT AGREEMENT AND RELEASE that I received from 27 FW JAD, 14 APR 94, had an incorrect date for the date of damage! That settlement offer was inadequate and refused. They sent another and that was refused for the same reason, the inability of my attending the game, and Christmas Day, with my family. Your "by demn" operations not only caused some physical damage but also denied my personal life plans. If you want to call it "...the \$500 claim for loss of recreation." that's fine with me. I called it "Unable to attend game: \$500.00." Please READ the claim form! Please don't trust what the folks at Cannon AFB are telling you; they have a problem of telling the truth and admitting to their misdeeds. This is just another example of the military attitude and double-speak. It's hard to get the truth- Read the Claim Form!

After I submitted the first claim, 28 FEB 94, I suffered more fly overs, and, again, tried to reconcile the problem by playing by your rules, by talking it out. So, Dale Harner, Airspace Manager, Jim Bryant, Assistant Claims Officer, and SSGT Gayle Ormons, Cannon AFB, and Maj Steve Ver Helst, Noise Complaint Officer, 150thFG, Kirtland AFB, Albuquerque, NM, met at my house here in the country on 5 APR 94. I had already found out that Mr. Harner was instrumental in reducing, rather reminding, eliminating, removing the previous avoidance are "promised" by Col Nicholson back in 1987. Through the guise of the Cannon EIS, "they" were "giving up too much airspace", so, they just deleted that previous agreement! Mr. Harner had heard that I had "moved back to Texas" so, he felt no need to notify me of his change of agreements. Now, I did not move my house or my ranch, so, why the change??? SSGT Ormons did provide me with the one page of NOISE SENSITIVE/AVOIDANCE AREAS, 27FW, that contains some 75 listlines. My house is #13, page 2, 24 MAY 94, and the location is in coordinates, and HOT DAMN, the date noted is 6 DEC 88!!! After I had moved to Texas! Double-speak again??

Can't anyone see a pattern here? Deny, make agreements, break agreements, cancel agreements, fly over, cause damage, deny once again, ... same old song and dance. Maj Ver Helst admitted the same, he just thought that since "we" had a letter writing campaign before, he did not want to write me that the 150thFG had changed the previous agreement. So, I was not extended the courtesy of notification that all previous deals were off. It was just done. Tighten up and smile, you've just been screwed-again!

The inconsiderate SOB's continue to buzz my house. I call in both to 27FW and 150FG, they deny the flights, and I have no recourse. But, Sir, I have witnesses! I am not alone out here suffering the same abuse and same disturbance to my livestock operation, and I continue to take pictures. I am getting prepared.

The Department of Defense decides to have an evaluation, I think demanded by the US Congress, of the continuing need to fund the B-1B Bomber program. USAF comes from I don't know where to the Roswell Industrial Air Center, Roswell, NM, the old Walker AFB, SAC, B-52 base. I am disturbed by the low level flying maneuvers as are my livestock. Some newly arrived deer hunters are especially disturbed because they haven't had to put up with the BS as I have. I purchase some calves raised on my ranch property from a friend that I have leased out some pasture to. I receive them, work them on 29 and 30 OCT 94. On 31 OCT 94, I release them into the same pasture east of my house that I released my calves into last year, the herd trap. It is a 1 1/2 section pasture surrounded by very good fence, on the south and SW portion 5 strand 12gga domestic barbed wire with steel T posts and 4 1/2" cedar fence posts. We've never had the damage as we experienced last year. Anyway, I pick up the phone and call Cannon AFB Public Affairs to advise SSGT Ormons that I do not want any low overflights over my cattle or my pasture fence. And to my surprise, the phones were manned by civilian personnel, Cannon AFB had declared a "GOLD DAY", they, the military were not on duty, it was a holiday! It was Halloween and they were not at work! I relayed my intentions and demands to the man person and expressly told him to "take a memo" and pass it on. He assured me he would. Well, he didn't; they have no record of it except on their 1-800 billing record to the Public Affairs Office. I made the call on "our" money. There should be a hard record of incoming calls. I feed and count my new calves for several days content they are acclimating and not escaping. I return home to Uvalde, Texas, for several days and when I return to the ranch there are four calves missing and the fence is busted, and the B-1B's are buzzing all around my house and calves. The hunters are astounded. I am very disturbed, why all my effort, watch the fence, and I secure my deer hunters, gather one calf, watch the fence, and drive right past Cannon AFB on my return to Texas to see my two sons play their play-off game in football. I would have probably said some thing that I would regret later so I went on by. When I returned to the ranch days later I filed my second claim through LtCol Chostner. I gathered two more head one day, one head another, and

found another steer calf dead. So much for minimal disturbance to us poor country boys trying to make a living under the FECOS NOA's.

I was checking my v-arlin' heifers 100 yards south of my house on foot on 29 NOV 94 and next to a water trough here at headquarters. There was an old pickup across the fence parked such that the battery would charge an electric fence charger to charge hot fence over the water trough. Weaned calves have a tendency to crawl through the trough seeking an escape route. As I was walking through the heifers, I noticed two F-111's flying east of me at about 500'agl traversing from the south to the north in the vicinity of my neighbor McCollum's house. They banked west and flew out over property continuing westward. About the same time, I noticed over head 2 F-4's at 4-5000'agl coming from the west southwest and going ENE. I continued inspecting my heifers and looked back east and here came the two F-4's on the deck right at me! I thought surely they would pull up and not disturb me or my cattle. Instead the first jet came right over me at 100-150agl, the second just slightly more south. Plainly in sight were my ranch headquarters, my tall molasses tank, my pens, barn, etc., but, the SOB's flew right over me! Way within the supposedly inn radius and 1000'agl "noise sensitive/avoidance area". All of a sudden the sky was like a bee hive and I counted the two F-4's along with four F-111's buzzing above me. Several of the F-111's were discharging little puffs of smoke in some sort of defensive measure. When the F-4's passed on top of me, I had to back-up against the fence to avoid being run over! I walked to the house and called it in. I didn't have a camera with me as I leave it in the feed truck to document the rest of the overflights. In a few moments they were gone.

Michael M. Pierson, Captain, USAF, 27FW/PA, Cannon AFB, has written me an explanation dated 7 DEC 94, Pearl Harbor Dry. And guess what? "...the F-4's were never lower than 1500 feet at any time during the entire exercise." See the same old pattern here? I saw 'em, called it in, public affairs told me they don't fly F-4's, they were unaware of their own exercise. Note too, that I did not see, nor report any F-111's in violation of the NSA. Reckon the Holloman AFB boys did not get the notice, or, like the others, just don't give a damn. Aircraft numbers are hard to detect when they fly straight over the top of you. Anyway, all the pilots collaborated their stories, their alibis, i. e., CIA. You know CIA, don't you Major Kirschbaum, cover your ass, CIA? So what? I can ID them, feel the excitement, suffer the damage, but, by damn, they're never here or never that low, it just happens. But, guess what? The neighbor to my east felt "like the roof was blowing off the top of his house!" Would we get that sensation at "...never lower than 1500 feet at any time during the entire exercise." I smell that CA-CA again.

On 7 DEC 94, as I was having my morning constitutional about 0858 local, I hear approaching aircraft thinking, surely they'll turn away. But, no, as the house shudders, I grab my pants and run out

into the front and search for the noise source. From the straight rear-end view of the single F-111 and the smoke trail, he came right over the top of my house, from the NE and going SW, and at less than 1000'agl. The terrain around my house is relatively flat and it doesn't take a rocket scientist to ascertain height above ground. Well, Capt Mike thinks it was three. I called in one aircraft violation, a flight of three that I continued to watch, as the three I saw turned back east from southwest of my house, and continued eastward south of my house. My employee, whoal another witness, told me he saw four; OK, I missed one.

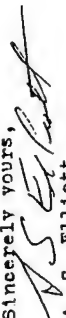
NO LtGen Ralston 703-697-9991

I have been talking with Col Thompson, Plans and Operations, USAF, Washington, D.C., and called him about 0935 that same morning, 7 DEC 94. I expressed my discontent and dissatisfaction with my 15 years of abuse by the USAF. I told him that there appears to be no "Officers and Gentlemen", that not one of you could ever confess to breaking, or stretching, the rules. I told him of the incident that I just experienced even though I have two out-standing claims and many years of denials. I said I waited bare-ass in my front yard for a second flight or a back course. He told me that I wouldn't see them again. Now, how did he know that? Do you just make one low pass, piss the folk off, and "never" return. As he was telling me that, he was also downplaying my disappointment that the low level abuse continues, you're all "Officers and Gentlemen".

To my estimation, you're all liars and inconsiderate federal employees. Well, not all. In my investigation from some false statements by the Commandant of the 150TFG, Col Quinlan, I called and wrote the 12th Air Force Inspector General, Berstrom AFB, Austin, Texas, several years ago. It turned out that the person named was not a part of the inspector general staff, but no more than a check ride pilot riding with the hot-dogs of the 150th. He did admit that he was alone on one of the sorties that flew over my house at 100'agl and that I called in. He said he was not informed of any route deviations, or sensitive areas. Right over the top of my house was not enough to qualify to comply with the consideration of the requirements of FAR's to even give me 500' vertical and lateral separation. He's been the only one to admit that he actually flew that day, in my area, and that low.

And so it goes... Lies, lies, and more lies. So much for me to behave like an officer and gentleman. Yes, I was an officer once and proud of it. But, I was expected to be responsible for my mistakes, and I was. That apparently is not the reputation of the United States Air Force. I'm tired of writing and defending my position. I invite to get off your ass and come out into the country and see how the rest of us are being disturbed; do a little on the ground "environmental assessment". I'd even buy your lunch. How about it? Come on down!!! How about the enclosed near report?

Encls
Addendum

Sincerely yours,

A. S. Elliott

CLAIM FOR DAMAGE, INJURY, OR DEATH				FORM APPROVED OMB NO. 1105-0008 EXPIRES 4-30-88	
1. Submit to Appropriate Federal Agency:					
INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheets if necessary. See reverse side for additional instructions.					
2. Name, Address of claimant and claimant's personal representative, if any. (See instructions on reverse.) (Number, street, city, State and Zip Code)		3. TYPE OF EMPLOYMENT			
A. S. Elliott d/ba El Bigote Cattle Co. P. O. Box 58 Port Sumner, NM 88119-0058		4. DATE OF BIRTH 21 JUN 46			
5. MARITAL STATUS Married		6. DATE AND DAY OF ACCIDENT 4-29 NOV 94, Friday-Wednesday Day/Night			
7. TIME (A.M. OR P.M.)					
8. Basis of Claim (State in detail the known facts and circumstances attending the damage, injury, or death. Identifying persons and property involved, the place of occurrence and the cause thereof) (Use additional pages if necessary.)					
I weaned 141 calves on Sunday, 30 OCT 94, and left in pens overnight. I released the calves the next morning onto feed and water here at HGRS. I called Cannon AFB, Public Affairs, same day, 31 OCT 94, to advise them of my operation and to ask/advise them not to overly like last year causing excitement of animals & damage to fence and injury to livestock. Since it was a "Gold Day", I was told, no military personnel were on duty; off trick or treating, I presume. I spoke with a civilian personnel. He assured me he would pass on the call. I fed and counted all 141 head until I left ranch on PM of 4 NOV 94. Upon my return, I discovered 4 head missing & fence damaged; 2 steel "T" posts broken, en, and remaining wires (3) had to be re-stretched. Fixed fence & gathered 3 head on 1 NOV 94, 2 on 25 NOV 94, I found 100' x 100' remained in trap. I took pictures					
NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, street, city, State, and Zip Code)					
BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF DAMAGE AND THE LOCATION WHERE PROPERTY MAY BE INSPECTED. (See instructions on reverse side.) Same as last year's fence, Sec 1, T1N, R24E, N40W, DeBaca Co NM. Spliced 2-12 gauge domestic barb wires, re-stretched all five, and will have to replace 2 steel "T" posts. Two cowboys gathered calves from adjacent pasture.					
10. PERSONAL INJURY/WRONGFUL DEATH					
STATE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM, IF OTHER THAN CLAIMANT. STATE NAME OF INJURED PERSON OR DECEDENT. NOTE: See claim of 22-25 DEC 93, submitted 28 FEB 94. B1 Bomber aircraft were seen and felt flying at extremely low altitudes over my pickup truck while feeding my livestock both before and after this damage claim. They were flying some DOD certification out of HIAC (see Walker AFB). Roswell, NM. I have pictures and witnesses. While I was feeding, I saw no F-111's, nor F-16					
11. WITNESSES					
NAME		ADDRESS (Number, street, city, State, and Zip Code)			
George Franklin		Ham Lane, Uvalde, TX 78801			
Pat Morris		Crystal City, TX			
Benjamin Elliott		HCR 32, Box 25, Uvalde, TX 78801			
Stephen Elliott		HCR 32, Box 25, Uvalde, TX 78801			
12a. PROPERTY DAMAGE		12b. PERSONAL INJURY		12c. WRONGFUL DEATH	
Material: \$ 5.00 Labor: 300.00		Inconvenience		12d. TOTAL (Failure to specify may cause forfeiture of your rights.)	
		1 Steer Cf: \$475.00		\$780.00	
1. CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE ACCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM					
13a. SIGNATURE OF CLAIMANT (See instructions on reverse side.)					
A. S. Elliott		13b. Phone number of Signatory		14. DATE OF CLAIM	
		505-355-7487		27 NOV 94	
CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM					
The claimant shall forfeit and pay to the United States the sum of \$2,000 plus double the amount of damages sustained by the United States. (See 31 U.S.C. 3729.)					
CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS					
Fine of not more than \$10,000 or imprisonment for not more than 5 years or both. (See 18 U.S.C. 287, 1001.)					

95-107
Previous editions not usable.

NSM 7540-00-834-0046
STANDARD FORM 95 (Rev. 7-85)
PRESCRIBED BY DEPT. OF JUSTICE
28 CFR 14.2

AN ADDENDUM TO LETTER: 11 DEC 94, Eugene J. Kirschbaum, MAJ, USAF

Read the enclosed copy of a story about Cannon AFB, NM. It appears almost bragadocio by some of the respondents. Note the highlighted areas, and especially the reference to "...the attacking fleet of aircraft engage in a mock dogfight over the Pecos River Valley southwest of Fort Sumner." Well Sir, that's me and that's just what I've been trying to relay to you folks back east. There is no specific mention of 100' x 100' flying, only mention of "low". You know, I hope you do, that there are numerous 100' x 100' routes all over New Mexico. VR 1198/1107 goes right over the top of my house and headquarters. And, by golly, it's current news!

The incidents that I have included in this end of explanation of what we have been subjected to are but just a few. I have kept a log and file of most all of my calls and letters. It will substantiate what I have experienced the past 15 years when I go to court to recover damages resulting from the military operations.

You might ask: If you've had problems for fifteen years, why then, are you just now suffering or reporting claims? My claims from the last year are verifiable; we saw/heard the aircraft for several days and nights, same times, same routes. We had a horse get cut up badly by a barb wire fence several years ago. The employee, owner of the horse, blamed my horse for chasing his horse into the fence. Well, it was his horse that was chewing the tails off of my horses. As it turns out, the horses were in the NE corner of the east herd trap that the 27thFW continues to fly over, east of my house, and it's right below one of their routes back over to neighbor McCollum's ranch! Coincidence, maybe, maybe not, but, probably so, resulting in injury to a horse by excitement due to low flying aircraft at night. McCollum's have also stated to me that F-111's, flying at night, have caused such excitement that the calves have run into their corral fences. While checking 2yr old calving heifers at night (no, all calves are not born unassisted, nor during the daylight) P-111 passes have caused these larger than calf size animals to bounce of their highway guardrail fence constructed corrals. Again, minimal disturbance??

Our measure of profit, out here on the range, is how many live livestock we have at sale time, and at what heavy weights. You see, Sir, we grow livestock: how many and how heavy we will have at the end of our production year. Your aircraft activity scare our livestock, sometimes resulting in injury or death, but, primarily, each time the cattle are excited, they run off weight- rather cattle, our success. When we have to repair fence and re-rather cattle, it disturbs our routine. We set further behind. But, it's only time and money, right? Exactly! Time and money! Time is money and you're costing me money. You're disturbing my life and economic operation in more than "a minimal disturbance" (Re: Cannon AFB, 27FW, EIS, 1992). Enough said.

A. S. Elliott



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE NEW MEXICO



EXHIBIT 5

April 11, 1997

27th Fighter Wing Public Affairs Office
100 S DL Ingram Blvd, Suite 204
Cannon AFB, NM 88103-5000

Mr A.S. Elliott
P.O. Box 58
Ft. Sumner, NM 88119

Dear Mr Elliott,

Thank you for your calls about aircraft flying in your area on March 27 and April 2. I assure you that as soon as we received your call we reported it to our Airspace Management Office. Our Airspace Management office then worked with the Airspace Management office at Dyess AFB in Abilene, Texas to investigate the B-1 incident.

The March 27 incident involved a B-1 from Dyess and an EF-111 from Cannon. The aircrews of both aircraft were interviewed and their flight plans/paths reviewed. The investigation revealed they were well aware of your NSA and avoided it by the appropriate altitudes and distances.

The April 2 incident involved a Cannon EF-111. The crew stated that they avoided your NSA by using the Santa Fe tracks as a guide, splitting the difference between the tracks and the NNE boundary to fly around the NSA.

We brief our aircrews on a regular basis on the NSAs in New Mexico, and hold them accountable for proper navigation. I hope that our responsiveness has helped and assured you that the aircrews do know of your NSA and plan accordingly to avoid that area.

If you have any questions please call me at our toll free number (1-800-446-4595, Ext.

4131) CALLED CAPT. FOSS TO EXPLAIN CONFLICT BETWEEN QUESTION AND ABOVE ANSWER. BY ISMA: NO RESPONSE.

Claudia M. Foss

CLAUDIA M. FOSS, Capt, USAF
Chief, Public Affairs

★ COMPLAINT/INQUIRY WAS TO ASCERTAIN WHAT ALTITUDE AIRCRAFT PASSED OVER ABOVE THEN WENT 80-90 DEGREES VERTICAL CLIMBING TOWARD WSWEST.

CYA CLOUDS TAKE ALTITUDE QUESTION - NOT MORE... Golden Legacy, Boundless Future... Your Nation's Air Force

CLAIM FOR DAMAGE, INJURY, OR DEATH		FORM APPROVED OMB NO. 1105-0008 EXPIRES 4-30-88	
1. Submit To Appropriate Federal Agency: 27 F. JAD 101 S DL Ingram Blvd Cannon AFB, NM 88103-5219		2. Name, Address of claimant and claimant's personal representative, if any. (See instructions on reverse.) (Number, street, city, State and Zip Code) A S Elliott P.O. Box 58 Ft. Sumner, NM 88119-0058	
3. TYPE OF EMPLOYMENT a. <input checked="" type="checkbox"/> MILITARY b. <input type="checkbox"/> CIVILIAN	4. DATE OF BIRTH 21JUN46	5. MARITAL STATUS M	7. TIME (A.M. OR P.M.) 1455
8. Basis of Claim (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof) (Use additional pages if necessary.) I was in my house (Cannon AFB NSA, DECCA) and heard aircraft approaching at low close range as they too often do. I ran outside and viewed a B-1B nose directly over my house at about 200' AGL. I looked up and right above me was the left engine pod and left wing attachment to the fuselage. I immediately called Cannon AFB Public Affairs and reported the violation of FAR and NSA. I also called Mr. Jerry Yudura, Lankley, VA, and as I was speaking with him, the aircraft (same or second) made a second extremely low pass just south of my ranch HQTRS. I later discovered a veering fully was cut from running into barbed wire fence, several boats and barbed wire broken from excited livestock running over it, and 1 yearling heifer with severed hooves from barbed wire.			
9. PROPERTY DAMAGE NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, street, city, State, and Zip Code) FOB 58 HELPER IS OWNED BY PARTNERSHIN, GOTTCOFFEE, OFFSHORE ATTACHED, FT SUMNER, NM BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF DAMAGE AND THE LOCATION WHERE PROPERTY MAY BE INSPECTED (See instructions on reverse side) 1 horse, cut on left hip, first fence west of 84, yearling heifer in corral HQTRS, See 2, T1N, R24E, NW1/4. three fence posts were reinforced and fire patched.			
10. PERSONAL INJURY/WHOLEFUL DEATH STATE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE NAME OF INJURED PERSON OR DECEDENT. Horse was cut on fence, not sutured, but septic. HELPER'S HOOFES (front, both feet) were severed (knocked) with cattle setting caught in barbed wire and trying to reverse themselves to escape. From the evidence of the broken/laid over fence, the cattle were excited over the fence and one heifer was caught within the wire severing the hooves while escaping. Heifer was dehydrated, dehydrated, and died within 24 hours on 10-10-96.			
NAME None other than Jerry Yudura heard second pass over phone. Lankley, VA *Note: Ficture taken by JAD personnel 10-10-96 after, maybe longer.			
12a. PROPERTY DAMAGE (12b. PERSONAL INJURY) Amount of claim (in dollars) \$1020.00 Total = \$1020.00		12d. TOTAL (Failure to specify may cause forfeiture of your rights) \$1132.00 US	
13. SIGNATURE OF CLAIMANT (See instructions on reverse side) A S Elliott 13c. Phone number of legatory 14. DATE OF CLAIM 505-555-7200 14JUN97			
CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS The claimant shall forfeit and pay to the United States the sum of \$2,000 plus double the amount of damages sustained by the United States (See 31 U.S.C. 3729) NSW 7540-00-634-004 STANDARD FORM 95 (Rev. 7-85) PRESCRIBED BY DEPT OF JUSTICE 28 CFR 14.2			



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE, NEW MEXICO

EXHIBIT 6

25 Apr 97

AA/AL/ED S-2-77

27 FW/CC
100 S DL Ingram Blvd Ste 100
Cannon AFB NM 88103-5214

Mr. A.S. Elliott
P.O. Box 58
Ft. Sumner NM 88119

Dear Mr. Elliott

Thank you for allowing Colonel Chip Uterback and the team from Cannon to visit you at El Bigote on Tuesday, 15 April. I hope we can continue our good neighbor relationship.

I am sending you a report of what we found and some recommendations that I think will help. The slight television interference they observed happened when the aircraft were within a mile of your house between the path of the TV signal and your TV antenna and when flying in an East-West direction. They noted that there was no noticeable disturbance from the mini-mutes or EF-111 and F-16 electronic emissions.

I want you to know that we do take your concerns seriously and will do everything possible to get you answers. Your concerns are our concerns.

Sincerely

Michael J. Koerner

MICHAEL J. KOERNER, Colonel, USAF
Commander

4: FAILED TO RETURN ORIGINAL POLAROID PHOTOS
AS REQUESTED: 1) DEC 96 MEETING WHEN
GIVEN, 2) SUBSEQUENT PHONE CALL w/ CAPT FO-
3) AT MEETING 15 APR 97

Communication Squadron Expert Technician

SUBJ: Visit to the El Bigote Ranch

1. Existing condition of Mr. Elliott's Television system was marginal as we found it. The initial reception we observed was marginal to good, but always with some interference noted. His TV was of good quality, but the antenna system had some defects inhibiting reception.
 - a. The antenna was missing four elements.
 - b. The antenna cable was taped to the antenna mast vs. using standoffs. This can cause moderate signal loss.
 - c. The booster system was connected to the antenna via coaxial cable with the center conductor resting in the receptacle. The braided portion of the cable was pulled back from the center conductor. When the braid was allowed to contact the outer portion of the connector receptacle (where it is normally connected) all reception was interrupted. An Ohmmeter was used on the coaxial cable to the antenna and it read an open, when it should have had some resistance.
 - d. The reception was also highly dependent upon the positioning of the antenna which could be rotated by hand using the mast.
2. The reception was tested after the initial setup and observations with multiple flybys and emission of a myriad of frequencies from the aircraft. My conclusion is that when disruptions to the already inhibited reception occurred, it was within a range of 1 mile of the aircraft and was not frequency dependent. The interference would begin a little over a mile out and would continue to approximately a mile beyond the house. My interpretation of that is the signal was interrupted momentarily by the physical body of the aircraft directly in the path of the signal. The interference that was present beyond the house on the same flight path was probably due to signals being reflected off the aircraft to the TV antenna.
3. A better antenna system would reduce the interference that Mr. Elliott receives. Any vibration of the house or antenna (door slamming, wind, etc.) can significantly affect his reception because of the antenna system. Again, all interference and disruptions occurred when the aircraft was within one mile of the house.



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE, NEW MEXICO

Television Tests
Mr A. S. Elliott
15 April 1997

The following tests were done at Mr A. S. Elliott's El Bigote ranch on 15 April to fact find what TV interference happens when the EF-111 and F-16 LANTIRN fly over Mr Elliott's house and when they emit radar signals. The GECCOs sites closest to El Bigote were also tested.

Aircraft and signal	Flight Direction	Observation on TV
1. F-16 - radar on, IFF on	East to West	slight wavering
2. EF-111 - radar on, IFF on	West to East	slight interruption in signal (2-3 seconds) and wavering
3. F-16 - no emissions	East to West	slight wavering
4. F-16 - ECM pod only	East to West	slight wavering
5. F-16 - NAV and ECM pod on	West to East	slight interruption in signal (2-3 seconds) and wavering
6. EF-111 Bands A - T had no interference on the TV		
7. EF - 111 - 1500 feet and 2 mile circle around Mr Elliott's house caused only a slight wavering		
8. GECCOs: - Yeso Site- 12A, 18C, 19A, 19B - no interference - FtSumner Site - 24E, 24F, 26C, 31A - no interference - Dunlop and Santa Rosa Site have same signals - 9A, 9B, 11B, 13B, 14A - no interference - Raven 3 (Mesa site) - no interference		

DUNLAP

EXHIBIT 7

5 January 1996

Mr. A.S. Elliott
P.O. Box 58
Fort Sumner, NM 88119

Dear Mr. Elliott,

I am writing to you to explain the changes we have made to the avoidance area over your property.

As you know, federal and military aviation regulations require our aircraft to avoid people, vehicles and structures by 500 feet in sparsely populated areas. In response to your earlier complaints we established a Noise Sensitive Area (NSA) which prohibited flight below 1000 feet Above Ground Level (AGL) within a one mile radius of your home.

Although this avoidance area exceeds federal requirements, the 27th Fighter Wing at Cannon Air Force Base and the 150th Fighter Group at Kirtland Air Force Base remain committed to minimizing the impact of flying activities near your home. In this regard, both Cannon and Kirtland are in the process of expanding this NSA up to 1500 feet AGL within a 2 mile radius of your home.

While our aircraft may occasionally fly over your property, they will be at much higher altitudes, significantly reducing noise levels on the ground. I have directed my staff to implement this change as soon as possible. Coordination with our squadrons here at Cannon as well as other units that use our airspace may require up to two weeks, but I believe you will see a significant reductions in aircraft noise immediately.

If you have any questions about our new procedures, please contact my Public Affairs Office at 1-800-446-4595 Ext 4131.

Sincerely

Michael Koerner

MICHAEL J. KOERNER, Colonel, USAF
Commander

Global Power For America



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27TH FIGHTER WING(AOC)
CANNON AIR FORCE BASE, NEW MEXICO

12 April 96

27 FW/PA
100 S DL Ingram Blvd Suite 102
Cannon AFB NM 88103-6216

Mr A. S. Elliott
Box 58
Fort Sumner NM 88119

Dear Mr Elliott

I am writing to you in response to your noise complaint about a B-1 bomber penetrating your avoidance area March 14.

An investigation has revealed that two B-1s from Dyess Air Force Base, Texas, penetrated the avoidance area while participating in a combined mission with one of our squadrons. The Cannon squadron had reserved the Pecos military operating area with our scheduling office and invited the B-1s to join the mission.

The local squadron point of contact did not ensure the "strange user" B-1s had a copy of the appropriate avoidance area listing. The B-1 crews did not request a strange user military operating area briefing from the airspace management office and the penetration of your avoidance area was a result.

As always we will continue to stress the importance for Cannon aircrews, as well as other operators of military aircraft, to fully comply with all Federal Aviation Administration and Air Force regulations regarding the use Cannon airspace.

Sincerely

DONNA LIEBER, SRA, USAF
Chief, Community Relations

CLAIM FOR DAMAGE, INJURY, OR DEATH				FORM APPROVED	
INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheets if necessary. See reverse side for additional instructions.				OMB NO. 1105-0008 EXPIRES 4-30-88	
1. Submit To Appropriate Federal Agency.				2. Name, Address of claimant and claimant's personal representative, if any. (See instructions on reverse.) (Number, street, city, State and Zip Code)	
27 FW JAD 101 S DL Ingram Blvd Cannon AFB, NM 88103-6216				A S Elliott Box 58 Fort Sumner NM 88119-0058	
3. TYPE OF EMPLOYMENT 4. DATE OF BIRTH 5. MARITAL STATUS 6. DATE AND DAY OF ACCIDENT 7. TIME (A.M. OR P.M.)				14 MAR 96, Thursday 1455	
8. Basis of Claim (State in detail the known facts and circumstances attending the damage, injury, or death. Identifying persons and property involved. The place of occurrence and the cause thereof) (Use additional pages if necessary.)					
I was in my house (Cannon AFB NSA, DECCA) and heard aircraft approaching at low close range as they too often do. I ran outside and viewed a B-1B as it directly over my house at about 200' AGL. I looked up and right above me was the left engine pod and left wing attachment to the fuselage. I immediately called Cannon AFB Public Affairs and reported the violation of FAR and NSA. I also called Mr. Jerry Yudura, Langley, VA, and as I was speaking with him, the aircraft (same or second) made a second extremely low pass just south of my ranch HQTRS. I later discovered a yearling filly was cut from running into barbed wire fence, several posts and barbed wire broken from excited livestock running over it, and 1 yearling heifer with severed hooves from barbed wire.					
9. PROPERTY DAMAGE					
NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, street, city, State, and Zip Code)					
FOB 58 Helfer is owned by partnership, GOTTOMTEE, affidavit attached. FT SUMNER, NM					
BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF DAMAGE AND THE LOCATION WHERE PROPERTY MAY BE INSPECTED. (See instructions on reverse side.)					
corral HQTRS, See 2, T1N, R24E, NW1/4, three fence posts were replaced and wire detached.					
10. PERSONAL INJURY/WRONGFUL DEATH					
STATE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE NAME OF INJURED PERSON OR DECEDENT. Horse was cut on fence, not sutured, but septic.					
Helfer's hooves (front, both feet) were severed by metal with cattle setting caught in barbed wire and trying to reverse themselves to escape. From the evidence of the broken field over fence, the cattle were excited over the fence and one heifer was caught within the wires severing the hooves while escaping. Heifer was dentured, dewatered, and fed.					
NAME ADDRESS (Number, street, city, State, and Zip Code)					
Alicencia Ferron address unknown other than phone number in Langley, VA					
*Note: Picture taken by JAD personnel 10-14 days after, maybe longer.					
12. (See instructions on reverse) AMOUNT OF CLAIM (in dollars)					
12a. PROPERTY DAMAGE		12b. PERSONAL INJURY		12c. TOTAL (Failure to specify may cause forfeiture of your rights.)	
\$112.00		\$112.00		\$112.00	
13. CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE ACCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM					
13a. SIGNATURE OF CLAIMANT (See instructions on reverse side.)					
A S Elliott CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM					
The claimant shall forfeit and pay to the United States the sum of \$2,000 plus double the amount of damages sustained by the United States (See 21 U.S.C. 3729)					
13b. Phone number of signatory 14. DATE OF CLAIM					
805-35-7110 14 JUL 96					
CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS					
Five (5) years, or more than \$10,000 or imprisonment for not more than 5 years (See 18 U.S.C. 287, 1001)					
STANDARD FORM 95 (Rev. 7-85)					
PRESCRIBED BY DEPT. OF JUSTICE					

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27TH FIGHTER WING(ACC)
CANNON AIR FORCE BASE, NEW MEXICO



29 May 96

27 FW/PA
100 S DL Ingram Blvd Suite 102
Cannon AFB NM 88103-6216

Mr. A. S. "Tex" Elliott
P.O. Box 58
Ft. Sumner NM 88119

Dear Mr Elliott

I am writing to you in response to your low-level noise complaints dated 14 and 21 May.

I understand your concerns over noise generated by military training in your area, however the airspace available to us to conduct training operations is very limited and very valuable.

As for the two noise complaints on 14 and 21 May, both were investigated by the Airspace Management Office. The first complaint was coordinated with the 524th Fighter Squadron who said they may have penetrated your noise sensitive area while flying between 500' and 1,000' AGL. Regarding the second complaint, even though all NSAs applicable to the airspace in use were pre-briefed and the majority of training occurred at 1,500' AGL, there were a few excursions down to 700' AGL. The aircrews involved extend their regrets for this inadvertent penetration of your noise sensitive area.

The aircrews are professionals who train for the protection of America's freedom while at the same time try to respect our New Mexico neighbors.

The 27th Fighter Wing takes complaints of the noise sensitive areas very seriously. If there are incidents in the future and you feel the aircraft breach the NSA, please let us know. We will investigate and provide you with a response as soon as the information becomes available.

Sincerely,

James R. Wilson
JAMES R. WILSON, 2Lt, USAF
Deputy Chief, Public Affairs



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27TH FIGHTER WING(ACC)
CANNON AIR FORCE BASE, NEW MEXICO

18 June 96

27 FW/PA
100 S DL Ingram Blvd Suite 102
Cannon AFB NM 88103-6216

Mr. A. S. "Tex" Elliott
P.O. Box 58
Ft. Sumner NM 88119

Dear Mr Elliott

I am writing to you in response to your low-level noise complaint dated 3 June.

After receiving your complaint, our office forwarded the information you provided us with to Cannon's Airspace Management Division.

Based on documentation from scheduling records, we were able to ascertain that there was a Cannon F-16 booked in the Pecos MOA around the time of the incident. Additionally, we have confirmed that there was an inadvertent penetration of your Noise Sensitive Area since the crew reported flying in the airspace near your home between 1000' and 1500' AGL at about 1:12 p.m.

The crewmembers would like to extend their sincere apologies as they try very diligently to respect all established NSAs.

As always, we will continue to place special emphasis on your NSA during squadron preflight briefings when training space issues are generally discussed.

If there are incidents in the future and you feel the aircraft breach the NSA, please let us know. We will investigate and provide you with a response as soon as the information becomes available.

Sincerely,

James R. Wilson
JAMES R. WILSON, 1Lt, USAF
Deputy Chief, Public Affairs



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE, NEW MEXICO

5 AUG 1996

27 FW/JA
101 S DL Ingram Blvd
Cannon AFB, NM 88103-5219

Mr. A.S. Elliott
DBA El Bigote Cattle Co
PO Box 58
Ft Sumner, NM 88119-0058
RE: Claim No: CANNON 96-559/N

Dear Mr. Elliott

Your claim has been considered under the provisions of the Military Claims Act, 10 U.S.C. Section 2733, as implemented by Air Force Instruction 51-501, Chapters 1 and 3, and has been approved for payment in the amount of \$277.00.

Based on our inspection on 2 Apr 96, it was our understanding that since the calf was crippled, it was not marketable and therefore would be slaughtered immediately. Therefore, we based this award on the weight of the calf and price per pound of beef at the time of our inspection on 2 Apr 96 (approximately 300 pounds at 55 cents per pound), which totals \$165.00 plus an additional \$112.00 to repair the fence.

A check in the amount of \$277.00 will be mailed to you at the above address as soon as two copies of the attached release are returned to this office dated and signed.

If you have any questions concerning your claim, please contact the claims office at (505) 784-2212, or write to 27 FW/JA, 101 S DL Ingram Blvd, Cannon AFB, NM 88103-5219.

Sincerely

Shannon R. Bishoff

SHANNON R. BISHOFF, Capt, USAF
Claims Officer

Attachment:
Release (3) copies

SETTLEMENT AGREEMENT

CLAIM OF Mr. A.S. Elliott, CANNON 96-559

I, A.S. ELLIOTT, hereby agree to accept the sum of TWO HUNDRED SEVENTY SEVEN DOLLARS (\$277.00) in full satisfaction and final settlement of any and all claims which I have or may have against the United States, its officers, agents, and employees for property damage sustained on 14 Mar 96.

I, A.S. ELLIOTT, hereby release and forever discharge the United States, its officers, agents and employees from all liability claims and demands of whatsoever nature arising from the said incident.

It is understood that the amount tendered is accepted in full satisfaction and final settlement and that the award is made pursuant to 10 U.S.C. 2733, the Military Claims Act, which provides for the settlement of disputed claims against the United States for property damage arising from United States Air Force activities and is not to be construed as an admission of liability by the United States, but as a release of the United States, its officers, agents, and employees.

Date:

A.S. ELLIOTT

13 August, 1996

Shannon R. Bishoff, Capt., USAF
Claims Officer, 27FW/JA
101 S DL Ingram Blvd.
Cannon AFB, NM 88103-5219

Re: Claim Stated Above

Your reasler, paltry, incompetent offer to settle my claim is refused by this letter/memo, after our phone conversation this morning for the following reasons:

1. The weight of the injured heifer yearling was/is grossly underestimated. The weight on the day of inspection was lower than when I received the animal on 9 FEB96 because of the severe trauma suffered.
2. Your offer is not the amount submitted nor experienced in my effort to save the life of the animal.
3. What "understanding" on 2 APR96? I received no written memo or whatever of "understanding". He discussed several alternatives, but, I do not remember any "understanding". Was I supposed to pay for slaughter too? I- that in "your understanding"?

Conclusion...? Offer is refused.

A. S. Elliott

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 8-4-97

Thank you for your input.

PLEASE PRINT

I strongly support the planned expansion of German Air Force training operations at Holloman AFB. Holloman is well equipped for a dedicated air bombing mission. The development of a dedicated air bombing mission to support not only the German Air Force training as well as current & future USAF missions at Holloman will ultimately act as an insurance policy to ensure HAFB's continued existence & support future missions.

The economic impact of the German Air Force on the local economy is currently \$12 million annually. That is in addition to the \$60 million in construction both on and off base (housing, etc.). The economic impact of the expansion to Holloman II is estimated at \$21 million annually & over \$100 million in construction over military & civilian. Our ability to support Holloman II demonstrates our commitment to HAFB, our willingness to support future missions, and our ability to follow through on our promise to support German Air Force training.

What has BLM done for Otero County or Alamogordo? Why are they the major lobbyist against this project? This project being our #1 economic engine!

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Mary Parag
ADDRESS: 3088 Los Kobles
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 8-4-97

Thank you for your input.

PLEASE PRINT

I HAVE ENOUGH DAMAGE FROM OUR OWN AIR FORCE IN THE FIRST. CIVILANS IN MY HOUSE, CATTLE STAMPEDES, THREAT FROM HORSE TWO WELLS COVERED IN

PIANES RIDEKE SOUND BARRIER 2 TIMES NEAR FORT SUMNER TO DAY AM!

COME ONE IN AUTHORITY NEEDS TO READ HISTORY!!

GERMAN: HAVE NEVER HANERED A TREATY!

RISK POLAND, RUSSIA, FRANCE, HOLLAND, AND 25 OTHERS!

I AM A VETERIAN OF OMAHA BEACH, NORMANDY, NORTHERN FRANCE, THE ARDEANS, FYNLAND, CENTRAL BERG, AND BERLIN WITH THE FIRST AIR BORN ARMY.

IT IS AN INSULT TO ME TO BRING THE GERMAN AIR FORCE TO DESTROY MY WAY OF LIFE!

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Clifton Paul King
ADDRESS: Box 226
CITY: Fort Sumner, NM
STATE/ZIP CODE: NM 88119

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769



LAND AND WATER FUND

Legal Aid For The Environment

August 4, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769
VIA FAX: 757-591-4199

Re: Draft EIS on Proposed Expansion of German Air Force Operations at Holloman AFB

On behalf of Forest Guardians, thank you for this opportunity to comment on the Draft Environmental Impact Statement (EIS) on the proposed expansion of German Air Force operations at Holloman AFB. Forest Guardians has a long-standing interest in the protection of public lands in southern New Mexico. Forest Guardians is a New Mexico, non-profit corporation with its principal office in Santa Fe, New Mexico. Forest Guardians has approximately 1,500 individual and business members who reside in New Mexico, Arizona, Utah, Colorado, and the Pacific Northwest.

These comments incorporate by reference those comments submitted by Marianne Thaele of the Rio Grande Chapter of the Sierra Club.

At the outset, Forest Guardians would like to make clear its deep disappointment with the preferred alternative proposed by the Air Force. The preferred alternative would destroy and render virtually worthless for wildlife 8 square miles of grassland and other habitat on largely undisturbed portions of Otero Mesa. This proposal has drawn almost universal condemnation from a diverse group of interests. County commissioners, ranchers, hunters and conservationists have all condemned the proposal, as has the Bureau of Land Management.

The current administration has emphasized the importance of ecosystem management, of ensuring that agencies do not work at cross-purposes in ways harmful to the environment. The Department of Defense has published (with The Nature Conservancy) a glossy manual "Conserving Biodiversity on Military Lands," 1996. The US Air Force's

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Serving the
Rocky Mountains
and Desert Southwest

Draft Environmental Impact Statement Expansion of German Air Force Operations at Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

DATE: 8-4-97

Thank you for your input.

PLEASE PRINT All of us are aware of how much Holloman brings to our city and county and the economic impact Holloman has and will continue to have here. We need to be receptive to those needs that can expand Holloman's mission to secure its future. The proposed bombing range can do that. Whether or not it needs to be on or off the mesa is not as important as it just needs to be. If the Air Force is certain that on top of the mesa is the best place and they can withstand challenges from environmental groups there let's put it there and move on.

This has been a tough deal for some folks in the county and in West Texas and I hope when it is all said and done that they have made a mountain out of a molehill. For more people in this county are dependant on Holloman for their livelihood than they are on the ranchers and the BLM. I don't believe there will phase out the ranchers way of life nor do I think the BLM should have any say in the matter, its just something that will take some time to get used to. But a larger, more vibrant Alamogordo will be good for all of us.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Don Griggs
ADDRESS: P.O. Box 88
CITY: Alamogordo, New Mexico 88311
STATEMENT CODE: _____

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

proposal with respect to Otero Mesa represents a text-book case of what ecosystem management is not. Rather than proposing as its preferred alternative one supported by the land management agency with shared jurisdiction of the area (the BLM), the US Air Force proposes the alternative that will destroy the most virtually unspoiled wildlife habitat, and an area with wide use for a variety of recreationists.

If the US Air Force is to do more than pay mere lip-service to the principles of ecosystem management and biological diversity, it should abandon its proposal to place a new bombing range on Otero Mesa.

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In addition, the draft EIS fails to take the required "hard look" at a number of impacts, including effects on endangered species waters of the US and endangered species, and fails to properly address the need to disclose mitigation measures, as is discussed in greater detail, below.

I. NEPA Requires Agencies to Take a 'Hard Look' at the Impacts of Proposed Actions.

The National Environmental Policy Act (NEPA) requires each federal agency to prepare and circulate for public review and comment a detailed environmental impact statement (EIS) prior to any major federal action that may have a significant effect on the environment. 42 U.S.C. § 4332(C); 40 C.F.R. §§ 1502.5, 1508.3 *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 336, 109 S. Ct. 1835, 1839 (1989); *Foundation for North American Wild Sheep v. United States Dept. of Agriculture*, 681 F.2d 1172, 1177-78 (9th Cir. 1982).

Congress intended that requiring agencies to prepare such EISs would help "prevent or eliminate damage to the environment and biosphere by focusing Government and public attention on the environmental effects of proposed agency action." *Marsh v. Oregon Natural Res. Council*, 490 U.S. 360, 371 & n.14, 109 S. Ct. 1851, 1858 & n.14 (1989) (citations and quotations omitted); see also *Robertson v. Methow Valley Citizens'*

¹ The BLM has been particularly outspoken concerning the negative impacts of the Air Force's proposal. "Developing a new bombing range is not appropriate for the Otero Mesa or the foothills portion of the McGregor Range. We vigorously oppose the proposal to do so." Letter of T. Murphy, BLM, Las Cruces Dist. Off., to S. Parker, US Air Force (Aug. 16, 1996). The Department of the Interior similarly concluded: "We do not believe that subjecting a high quality area such as the Otero Mesa and Foothills area to the impacts of military activities is appropriate when previously affected areas of lesser environmental sensitivity are available on the McGregor Range." Letter of B. Armstrong, Assistant Secretary, Land and Minerals Management, US Dept of the Interior, to R. Coleman, Assistant Secretary of the Air Force (Mar. 3, 1997).

Council, 490 U.S. at 349, 109 S. Ct. at 1844. Only in this way, Congress concluded, would an agency elevate the consideration of the environmental effects of its proposed actions to the same level as other, more traditional, factors. See *North American Wild Sheep*, 681 F.2d at 1177.

Federal courts have interpreted NEPA to require that when preparing an EIS, agencies must take a hard look at the potential impacts of a project. *Kleppe v. Sierra Club*, 427 U.S. 390, 410 n.21, 96 S.Ct. 2718, 2730 n.21 (1976); *Robertson v. Methow Valley Citizens Council*, 490 U.S. at 374.

The agency's statement of reasons "is crucial" to determining whether the agency took a 'hard look' at the potential environmental impact of a project. *Save the Yaak*, 840 F.2d at 717. Reviewing courts must confirm that "the agency decision is founded on a reasoned evaluation of the relevant factors." See *Citizens to Preserve Overton Park*, 401 U.S. at 416, 91 S.Ct. at 824 (1971).

In addition, Council on Environmental Quality (CEQ) regulations recognize that intelligent decisionmaking can only derive from high quality information. Information included in NEPA documents "must be of high quality. Accurate scientific analysis ... [is] essential to implementing NEPA." 40 C.F.R. § 1500.1(b). Where an agency has outdated, insufficient, or no information on potential impacts, it must develop the information as part of the NEPA process.

In numerous areas, the draft EIS fails to take the hard look required by law.

A. The Draft EIS Fails to Disclose Impacts to Endangered Species.

The draft EIS indicates that the US Air Force has thus far failed to conclude consultation required by Section 7 of the Endangered Species Act concerning the impacts of the proposed project. The US Air Force has further admitted that it will likely not conclude Section 7 consultation until after it completes the final EIS. Personal communication with Sheryl Parker (July 1997). Thus, the public will have no opportunity to comment on or review what the expert agency in these matters -- the Fish and Wildlife Service -- has to say about the potential for jeopardy to numerous species. Consultation is hardly an academic exercise in this case since a number of candidate, threatened or endangered species -- including the aplomado falcon and wintering bald eagles -- have been observed in or are known to have potential habitat in the project area. Draft EIS at 2-60, 3-86.

B. The Draft EIS Fails to Disclose Numerous Site-Specific Impacts

"Construction and use of either NTC [new target complex] would likely result in impacts to some or all of ... potential Waters of the US. If either NTC option is selected, final determination of these streambeds as Waters of the US by the Corps of Engineers would be required." 2-67. The proposed action could harm up to 46,000 linear feet - almost 9 miles - of stream channel; over 6 miles of streambed could be impacted by the Tularosa Basin proposal. Draft EIS at 3-83. Why is the Air Force waiting until after it makes its decision to disclose the impacts on these important resources? Where are these potential waters, and where would potential harm occur? NEPA requires agencies to plan their actions and disclose impacts, not put off the discussion until after a decision is made. But that is exactly what the US Air Force proposes to do: "field evaluations of specific sites from construction of roads, firebreaks, and targets would be performed [after the Air Force chooses an alternative] to avoid Waters of the U.S." Draft EIS at 4-78.

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The Draft EIS's failure to locate impacts on potential waters of the US highlights a larger, recurrent problem. Because the US Air Force fails to disclose exactly where it intends to construct specific features of the bombing range, the agency fails to disclose (and has no idea itself) the proposal's site-specific impacts. Rather than take a hard look, this draft EIS is based on the premise that the agency can build its bombing range anywhere it pleases in a general area, and that a general description of impacts is sufficient. The Air Force cannot proceed on this bases, but must disclose where it intends to build roads, firebreaks, and targets. Unless it does so, it cannot present an accurate evaluation of the impacts of the varying alternatives, and how those impacts compare. Thus, the Air Force's approach subverts the very purpose of NEPA -- to allow the public and the decisionmaker to understand the likely impacts of a proposal before it is implemented.

For example, the draft EIS states that "[s]pecific design of these improvements [to roads] have not been accomplished for the west Otero Mesa site." Draft EIS at 2-45. The Federal Highway Administration conducts numerous EISs each year which present in great detail the footprint of road improvements, describing their impacts on the environment. Here, the Air Force again shrugs off the matter for later consideration. NEPA clearly does not permit this approach.

In addition, the Draft EIS fails to describe the location of various proposed targets within the bombing range. Rather than specifying where what impacts will occur, the Draft EIS contains a figure showing the "typical impact area configuration." Draft EIS at 2-30. But the EIS should reveal not what the "typical" area will look like, but what the Air Force intends to put on the ground and where it intends to put it for varying alternatives. Because the Air Force fails to do so, it has failed to take the hard look required by NEPA.

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C. The Draft EIS Fails to Disclose Conflicts with Local Land-Use Planning

CEQ regulations recognize as one measure of "significance" the degree to which an action "threatens a violation of ... local law or requirements for the protection of the environment." 40 C.F.R. § 1508.27(b)(10). The draft EIS acknowledges that Otero County's Interim Land Use Policy Plan supports the use of the McGregor Range for, among other things, "hunting, hiking, and observing nature." DEIS at 3-36. Clearly these opportunities will diminish with the destruction of 8 square miles of habitat there. The draft EIS fails to acknowledge these conflicts with local planning efforts. That these activities will be harmed is beyond dispute, since the Draft EIS admits that access for recreation and other activities could only occur "from Friday afternoon through Sunday each week" by a new target complex. Draft EIS at 4-39. Those who have accessed the area during the week in the past and/or who wish to do so in the future will have their recreational opportunities severely limited. The draft EIS relies on one citation (Carpenter, 1997) to bolster the draft EIS's otherwise unsupported conclusion that the Otero Mesa option would "not ... affect hunting activities." Draft EIS at 4-40. Interestingly, no reference to this citation occurs in the "References" chapter of the draft EIS. Numerous comments from local hunters and hunting organizations also directly contradict this suspect conclusion.

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D. The Draft EIS Fails to Discuss Mitigation Measures.

"Implicit in NEPA's demand that an agency prepare a detailed statement on 'any adverse environmental effects which cannot be avoided should the proposal be implemented,' 42 U.S.C. § 4332(C)(ii), is an understanding that an EIS will discuss the extent to which adverse effects can be avoided." *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 351-52 (1989). CEQ regulations implementing NEPA require that the agency discuss possible mitigation measures in defining the scope of an EIS, 40 C.F.R. § 1508.25(b), in discussing alternatives to the proposed action, 40 C.F.R. § 1502.14(f), and consequences of that action, 40 C.F.R. § 1502.16(h), and in explaining its ultimate decision, 40 C.F.R. § 1505.2(c); see also *Robertson v. Methow Valley*, 490 U.S. at 351-52 (finding CEQ's interpretation of NEPA persuasive and controlling).

It is thus well established that an agency must develop, discuss in detail, and identify the likely environmental consequences of proposed mitigation measures. *Robertson v. Methow Valley*, 490 U.S. at 352 ("[M]itigation [must] be discussed in sufficient detail to ensure that environmental consequences have been fairly evaluated ...") Effectiveness of mitigation measures must be disclosed. *Northwest Indian Cemetery Protective Association v. Peterson*, 764 F.2d 581 (9th Cir. 1985), *rev'd on other grounds* 485 U.S. 439 (1988), (NEPA requires agencies to "analyze the mitigation measures in detail [and] explain how effective the measure would be A mere listing

of mitigation measures is insufficient to qualify as the reasoned discussion required by NEPA," (emphasis added)).

Not only must NEPA analysis explore and analyze potential mitigation measures, but a decision to proceed with a project must not be based on arbitrary assumptions about the success of mitigation measures.

[W]here an agency's decision to proceed is based on unconsidered, irrational, or inadequately explained assumptions about the efficacy of mitigation measures, the decision must be set aside as "arbitrary and capricious."

Stein v. Barton, 740 F. Supp. 743, 754 (D. Alaska 1990) (where letters and reports of agency experts questioned effectiveness of mitigation measures proposed in EIS, agency ROD overturned as arbitrary and capricious).

As the Environmental Protection Agency noted in its comment letter of July 21, the Draft EIS fails to contain any discussion of mitigation measures. The US Air Force must include such a section in any subsequently prepared NEPA document.

E. The Draft EIS Fails to Examine a Range of Reasonable Alternatives.

The requirements of NEPA and regulations implementing it clearly require agencies to consider all reasonable alternatives to an agency action in preparing environmental review documents. NEPA requires agencies to:

Study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.

42 U.S.C. § 4332(2)(E). Federal courts and CEQ regulations implementing NEPA make clear that the discussion of alternatives is "the heart" of the NEPA process. 40 C.F.R. § 1502.14. In order to "sharply defin[e] the issues and provid[e] a clear basis for choice among options by the decisionmaker and the public," environmental documents must explore and evaluate "all reasonable alternatives." *Id.*

An agency is "entitled to set some parameters and criteria . . . for generating alternatives to which it would devote serious consideration." *Idaho Conservation League v. Mumma*, 956 F.2d 1508, 1522 (9th Cir. 1992). However, it may not "consider only those alternatives with [the same] end result." *State of California v. Block*, 690 F.2d 753, 767 (9th Cir. 1982) (finding that Forest Service failed to consider adequate range of alternatives in recommending development of wilderness study area). For instance, agencies may not fail to analyze alternatives that only address part of the project's

purpose. "[An] EIS must . . . consider alternatives to the proposed action as may partially or completely meet the proposal's goal and it must evaluate their comparative merits." *Natural Resources Defense Council v. Callaway*, 524 F.2d 79, 93 (2nd Cir. 1975); see also *North Buckhead Civic Association v. Skinner*, 903 F.2d 1533, 1542 (11th Cir. 1990), citing *North Buckhead Civic Association v. Skinner*, no. 88-2477 at 27 n. 5 (N.D. Ga. 1989) (alternatives "partially satisfying purpose and need of the proposed project" need to be considered if they are "reasonable"). Furthermore, "a discussion of alternatives that would only partly meet the goals of a project may allow the decisionmaker to conclude that meeting part of the goal with less environmental impact may be worth a tradeoff with a preferred alternative that has greater environmental impact." *Id.*

The Air Force dismisses without sufficient explanation a number of potential alternatives that would partly meet the goals of the project. For example, the Draft EIS dismisses Location Number 9 on the White Sands Missile Range (WSMR) in part because of "unacceptable conflicts with mission activities at both Fort Bliss and WSMR." Draft EIS at 2-25. The nature of these conflicts is not divulged, nor what changes to the other "mission activities" could occur to accommodate greater use by the German Air Force. In addition, as Ms. Thaeler states in her comments, the Draft EIS fails to consider the reasonable alternative of constructing an NTC on the WSMR. Why the USAF must destroy virtually pristine ground when already disrupted ecosystems exist in close proximity is nowhere explained.

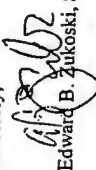
Finally, any subsequently prepared NEPA document must address the alternative of placing the newly proposed operations in a location other than Holloman AFB. Ms. Thaeler, for example, suggests several other options in the US. In addition, the Draft EIS fails to explain why the US and German Air Forces cannot train in Germany. After all, the trip will certainly be shorter for the German Air Force and their dependents. Clearly, the infrastructure to support German air flight operations must exist in abundance there. If the main reason for location in the US is that Germany does not permit or have the room for such low-level overflights, why should the US become the dumping ground for environmentally undesirable activities?

CONCLUSION.

Forest Guardians urges the Air Force to substantially revise any subsequently prepared NEPA document to address the legal inadequacies of the Draft EIS discussed above, and strongly urges the Air Force against choosing the West Otero Mesa alternative.

We look forward to your reply. If you have any questions in this regard, please call me at 303-444-1188, ext. 213.

Sincerely,


Edward B. Zukoski, Staff Attorney

Attorney for Forest Guardians

cc: John Horning, Forest Guardians
Marianne Thaeler
The Hon. Kathleen McGinty, Chair, Counsel on Environmental Quality

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: Aug 4-1997

The National Military Strategy -
ITS INSANE... to bring Forevers into our Country
with Airplanes, armed and Flying over and could Destroy
Anything I like our Airbases, kids, Dams Bridges etc.
Germanys Wilhelm started World War I used mustard
gas on our troops. Had a uncle who lived the rest of
his life with the damage that caused. World War II
was started by Germanys Adolph Hitler wanting to
control the World, America lost hundreds of thousands
of good men. Also the Holocost where they killed a
million Jews. This reminds me of the Greek city of Troy
who received a gift a large wooden horse though their
city gates and lost their city. Now these people are our
friends? You are betting your and our lives on it.
I have a brother who was in Patton's 3rd Army who fought
from Normandy, Paris, Metz, Battle of the Bulge a
meet a Russian Army. A lot of his buddies died.
Our Air Force is the best in the World and it needs
to be maintained. We don't need to train our possible
enemy to be as good or better. Keep our secrets from
them. Germany has a Country and purchased the Toronado
Airplanes from France. So fly them over Germany
and France!! Can you imagine France selling Germany Planes
when both world wars the Germans whip them in a few days.
**** CONTINUE ON BACK FOR MORE SPACE **** could happen to this

NAME: JAKE AND LEANA WEST

ADDRESS: RT1 Box 17A

CITY: Ft Sumner, N.M. 88119

STATE/ZIP CODE:

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 22665-2769

OVER

✓

We dont want ANY foreiners flying over our County especially our farm where we raise Cattle and Ostrich, our own Air force is already causing lots of damage to livestock and fences etc, their plan calls for 6,000 sorties - They say the sound or noise is as back as the F16 which is horible you can here them from 6 to 10

Miles away.
 Were Native New Mexicans and live our Peace and Tranquility. Its bad enough putting up with our own Airplanes and they dont need any help from the Germans or any other, we dont need any foreign troops in us either

WE DONT WANT A ONE WORLD GOVERNMENT
 we need to find solution to the noise of our own planes. The effect it is having on people who are more important than the endangered species

Sincerely
 James W. West
 Leona J. West

Requing Response Time

30 Days

Mr. Sheryl Parker

40 AEC/CAVA

123 Andrews Street 9/02

Longley AFB, LA. 2365-2765

Mr. Sheryl Parker,

I would please find some way to the public Affairs Office of Holloman Air Force Base at Holloman, New Mexico. Since the 1st day of June 1992 - in the time I devote my continued research. The General Air Force a statement showing that Captain Lawrence Cox Antares my letter to establish our relationship in this information was a picture of a General Air Force Command Headquarters Letter At Fort Bliss, El Paso, Texas

I recalled Captain Lawrence Cox told me I did not receive information regarding the Agreement between the United States Government & the Republic of Germany. It is that since the would be live in a letter according to the Agreement (see in of July 20th 1992)

I am confident as I have stated in my original letter to Holloman Air Force Base regarding National Security.

I also a copy of the Agreement & I see that Agreement was Congressional Approval.

Also I also to know by your assessment on
 legislation that a ground Air Force command
 Center in Fort Bliss, Texas was allowed.

As I had stated in my previous letter
 to Captain Lawrence Cox, there is a Marine
 of National Security & I am a National Security
 for National Security issues & it is the intention
 of the United States Air Force to make known
 why a foreign power is made allowed not only
 to train pilot in the United States but also
 military personnel in the United States & to have
 a command center of a foreign Air Force on our
 soil.

If you cannot provide me with the necessary
 documents please forward to my officers who
 can

Respectfully
 Gary Steven Foster
 North Star Youth Alliance
 453 Douglas Ave
 Elgin, Illinois 60120

Date this first day of August 1997

Public Affairs Officer

Public Affairs Office

Holloman Air Force Base

New Mexico, U.S.A.

88330-5000

Good Morning Sir,

Enclosed please find a copy of an Article Relating
 the Activities of the Ground Air Force at Holloman Air
 Force Base.

I am a registered lobbyist for National Security
 Issues (I.O.# 37987000) & I have some questions concerning
 having a foreign power in the United States with their
 military hardware.

I am interested under what agreement is the
 Ground Air Force allowing access to a U.S. military
 installation & what type of agreement is a Congressional
 Approval.

In the Enclosed Article it states training exercises
 of 100 Ft & future recent configurations there are
 not their training exercises but offensive training
 exercises.

To what extent are we in the United States operating
 our Air Defense Strategies to these plots.

Foster

At Pan as a National Security Service I am

Culcianso

that we have Fostered mid, very Harshness

Fostered plan point can maneuver in our

Said.

What is after a parasite skin over Abrogance,

Drawn on board?

We have no seen the future of the Vanguard

Cooperative between in the future they will be the future

on Feb. Under this uncertainty I believe it will

To Assess their future. Minors.

Handley for taking the time to read this

Consequence

Respectfully

GARY STEVIN FOSTER

Dala Northstar Youth Alliance

To Respond:

GARY STEVIN FOSTER

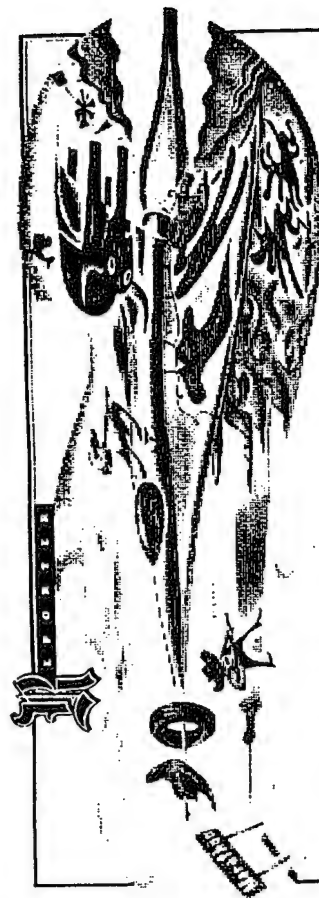
453 Douglas Ave

Albany, Oregon 97320

Dated This 1st Day of June 1997

— Required Response Time —

— 30 Days —



Dogfight

West Texans are warring with the Air Force over low-flying jets.

by Patricia Sharpe

YOU DON'T KNOW THEY are there, then suddenly there's a horrible roar, your vehicle starts shaking, and you almost lose control," Charles Bergmann, the director of a Fort Davis ambulance company, was recalling the four or five times in the past few years that his ambulances have been buzzed by low-flying military jets. Luckily, no one was hurt, but those incidents were on his mind because—if the United States Air Force does what it plans to—he and every inhabitant of the highest, loneliest part of Texas can expect a lot more unwanted airborne guests.

In June and July officials at Holloman Air Force Base—where pilots of the German Air Force have trained since 1992—held a series of meetings to explain to stunned residents of West Texas and New Mexico that German Tornados and other aircraft would likely be flying training missions in a vast figure eight stretching from the westernmost corner of Texas nearly to Big Bend.

The planes would not fly close to cities or state or national parks, but the area in general could expect flights as low as one hundred feet above ground level two to three times a day, possibly by next spring. The locals were first incredulous, then incensed. Other air bases already used the Texas Pecos for training (though infrequently), and many people had experienced close encounters of the jet-propelled kind. Persimmon Gap Ranch owner Ben Love told of coming within three seconds of being creamed by a low-flying F-4 while landing his single-engine plane. Everyone remembered that in 1992 a B-1B bomber had smashed into a mountain near Valentine. The Border Patrol was particularly concerned because its planes fly low and slow tracking aliens. Not only that, but it estimated that if its operations were cut back for safety reasons, an additional \$3.24 million worth of drugs could enter the U.S. in the next five years. (In August the Air Force and the Border Patrol met to dis-

But if collisions were a potential threat to fliers, the noise could disturb everyone. The sound of a jet flying an average of 515 miles an hour 100 feet overhead measures 112 decibels, equivalent to the shriek of a circular saw one foot from your ear. Holloman spokesman Captain Larry Cox explained that the loudest noise would last only one to two seconds and that any given spot was likely to be flown over only once every three weeks. But the locals weren't buying it. Once would be enough to make cattle stampede or spook a horse (a cowboy at Tom Beard's Leoncilla Cattle Company was thrown and injured during a flyover several years ago). Businessmen were also worried about spooking tour-

ists and hunters, who come to bag exotic game, and if that money evaporated, the Texas Pecos would be higher and drier than it already is.

Despite the protests, the missions seem likely to happen because the pilots and the planes are in place and the draft of an environmental assessment predicted the flights would have no significant impact. It looks like the region—beautiful but poor and politically powerless—is getting dumped on again: Sewer sludge from New York is being spread on farmland ninety miles from El Paso, nuclear waste might soon be stored in the area, and now this. If nothing is done, the severity that is the soul of West Texas could be coming to an end—not with a whimper, but a bang.

TOPICS

America's Marketer The Dallas Cowboys began the season strong on the scoreboard, but they've continued to score big on the battlefield. In a coup reminiscent of his deals with Pepsi and Nike, owner Jerry Jones has made an as yet unannounced deal to design Columbia/HCA Healthcare Corporation as the team's official medical provider. This means that Columbia can use the relationship, along with the Cowboys' helmet and logo, for promotional purposes—for a price, of course. Columbia is rumored to have purchased sky boxes and advertising space at Texas Stadium. Let it be said that Baylor University Medical Center, the longtime medical provider for the Cowboys, which, as a nonprofit hospital, was in no position to outbid Columbia, the world's largest hospital chain. ... **Big Bend Up** The Creek Workers at the national park's headquarters sang "Hello, Dolly" when the season's fourth hurricane broke up over Mexico and delayed the drought-stricken region in August. But be careful what you wish for: Tule Wagon Creek has been threatening to change course, and now after Dolly's untimely runoff, park visitors cannot easily cross the creek to take the popular hike into Santa Elena Canyon. **PAUL BUNKA**

P. C. Box 480
Hillsboro, N. M. 88042

August 4, 1967

Ms. Sheryl E. Parker
HQ ACC-CEVA
129 Andrews Street
Suite 102
Langley Air Force Base, VA

Dear Ms. Parker,

I just returned from vacation to find that I have missed the deadline to respond to the German Airforce Training and the fly overs above and near Hillsboro, N.M. However I am writing anyway in the hopes that my letter will also be considered.

I am very much against these training missions in our area. To be honest, seeing the whites of a pilots eyes is not in my best interest, nor is hearing the sound barrier being broken repeatedly. While I currently do not have a heart condition, I have experienced palpitations in the past upon seeing some of the deardevil flying in this area. As to the cracks that have reappeared in my house after the sound barrier breaks I'm sure a bill to have them re-repaired would not be welcomed on your desk.

Thank you for your attention in this matter.

Sincerely,

Janet S. Colville
Janet S. Colville

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,

James S. Saltsman

1405 N. Ash St.
Torrance, CA 90501

ARRHAKTS
GINTOLE

P.O. Box 1072 Magdalena, NM 87825 > 505-854-2596

August 4, 1997

I am writing to say NO to the German-
French flights being considered for
Jemez County.

People in this mountain community
of Magdalena and its surrounding
choose to live here for the peace
and the wildlife. Both of these
aspects of rural life are being endangered
due to this USAF proposal.

Sincerely -
Pat. [unclear] Smith

BB 1072 NM 87825
Magdalena, NM 87825



Ms. Cheryl K. Parker
HQ ALC/CDA
129 Andrews St.

Dear Ms. Parker,

I am against the proposed use of low level German
Tornado training flights on the VR-176 flight path. I view
this as an outright sale of our peace and quiet and quality
of life to foreigners. If this expansion goes through, it
will have a very negative impact on people, livestock and
wildlife in this area.

Sincerely,

Debbie Dief

405 W. 5th St.
Twelfth (Coney) N.Y.C.
87901
8/5/97.

Dear Mrs. Farber,
I am sending you
this paper to help you
understand better what the
people of T. or C. are worried
about... Concerning the German
Air Force Expansion at Whist Sando
N. May, I wonder why can't the
German use the bases that are
already closed in U.S.A. or
Why can't the Germans
use their own bases in Germany?
What about our Elephant Butte
and Caballo dams, in Sierra County,
will the loud come down when
they?

Sincerely yours,
Walter de Waters

W-273

Dear editor, *Disentangled*

I and many others are very much against allowing the German Air Force to expand training operations (including bombing) in New Mexico. It is bad enough that our own military is doing low-level flying and creating loud sonic booms, but to have foreign military doing that upsets me and goes against my grain.

What is the need for all this? I have heard from our own military that this training is needed to help us in case of a crisis and to help protect ourselves. If we need a former enemy to help us protect ourselves, we are in a sad state of affairs. This means that our military is not as good as we are led to believe. Here we are down sitting our armed forces and bringing foreign ones to U.S. soil. Something smells rotten here.

Are these foreign troops being trained for something else? Like the control of U.S. citizens? Makes one wonder.

I belong to an organization called Preservation of the Caballo Mountains Inc. This is an organization that is dedicated to preserving the rightful use of private and public lands.

I don't believe that bombing the hell out of our state or parts of it is in anyway, shape or form the rightful use of our lands. We keep losing our public lands or the use of them — I say, enough of that! We don't intend to lose more.

We are tired of the Federal Government taking away our lands every time they feel like it. Listen to the people once in a while, listen to the ones who pay for all these programs including your (the military's) pay checks, don't bite the hand that feeds you.

It concerns me that those loud sonic booms may well weaken the dams.

I say no to this foolishness of our federal government allowing foreign military to train, including low level bombing. If they want to do this, let them do it in their own country.

Like the citizens of Brewster County, Alpine, Texas, told the Air Force when they held a meeting similar to this (one in T or C July 9), quoting the newspaper Alpine Avalanche, "Not 'no', but hell no."

Leonardo Rivera
Truth or Consequences, NM

<<< >>>



2

- In summary the RAC supports the BIM position that development of a new bombing range on Otero Mesa is inappropriate.

Sincerely,



Cecilia Abeyta
Chairperson, NM
Resource Advisory Council

Dear Ms. Parker,

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,



John Silva

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 8-6-97

WE'VE HAD FAR TOO MANY CUT BACKS
IN THE MILITARY.
I APPRECIATE OUR MILITARY AT
HOLLAMAN & THE PROTECTION THEY OFFER
I AM FOR ANY THING THEY NEED
TO AFFORD BETTER PROTECTION, &
SUPPORT THEM 100%.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: FATIMU CECILIA - PRO-CUTS
ADDRESS: P.O. BOX 2798
CITY: TUJICO
STATE/ZIP CODE: NM 88345

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCICEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Location 3205 N. White Sands Blvd - Langley AFB, NM 88345

**National Parks
and Conservation Association**

SOUTHWEST REGIONAL OFFICE

DAVE SIMON
Regional Director

August 6, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

Capt. Lawrence Cox, Director
Public Affairs Office
49 Fighter Wing/PA
490 First Street #2800
Holloman AFB, NM 88330-8287

Re: Draft Environmental Impact Statement for the Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico and Environmental Assessment for the Proposed Airspace Modifications To Support Units at Holloman AFB, NM

Dear Ms. Parker and Capt. Cox:

Thank you for sending the National Parks and Conservation Association (NPCA) the draft Environmental Impact Statement for the Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico (DEIS). NPCA is America's only private non-profit citizen organization dedicated solely to protecting, preserving and enhancing the U.S. National Park System.

Given NPCA's leading role in issues of concern to our national parks, our focus in reviewing the DEIS was the impact of the proposed action on White Sands National Monument, Salinas Pueblo Missions National Monument, El Malpais National Monument, Gila Cliff Dwellings National Monument, Guadalupe Mountains National Park, and Carlsbad Caverns National Park. Of immediate concern is that while fully half of New Mexico's National Park Service (NPS) units are affected by the proposed actions, none of the maps in the DEIS identify more than one unit (White Sands NM). Clearly, it is impossible for the public to assess impacts on these national treasures if they are not even identified in relationship to flight corridors.



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W-275

In its August 30, 1996 comments on the USAF's draft Environmental Assessment for the Proposed Airspace Modifications To Support Units at Holloman AFB, NPCA concluded that "We encourage Holloman AFB to design a set of viable alternatives for meeting the Air Force training mission. These alternatives should include options for shifting training operations to bases other than Holloman AFB, as well as options for managing training operations from Holloman in ways that minimize the impacts on Big Bend National Park, Guadalupe Mountains National Park, and Carlsbad Caverns National Park, or eliminate impacts altogether. Consideration should be given to relocating training operations away from these sensitive areas rather than inviting the GAF to fly in the region." Despite these concerns and a host of mistakes in the draft EA, not only did the USAF choose to ignore NPCA's suggestion that the EA be withdrawn, but it appears that only one of NPCA's comments on the draft EA (the USAF's failure to recognize 10,000 acres of Guadalupe Mountains National Park), was incorporated into the final EA.

Furthermore, notwithstanding our opposition to the draft EA, one year later, NPCA is being asked to comment on a proposal that actually seeks to *increase* the number of Tornado jet overflights in our national parks and other public lands, using these same proposed airspace modifications. At the Gran Quivira unit of Salinas Pueblo Missions National Monument, for example, the DEIS proposes to increase the daily sorties from 16 to 20. Although the DEIS states that direct overflight of the monument will be avoided, there is no guarantee that weather conditions, human error and other factors will always allow for such avoidance. More importantly, without a clear discussion of cumulative impacts of existing Military Training Routes (MTR's) and other airspace uses in the area around Gran Quivira, it is impossible to determine what the impact on the fragile prehistoric and historic resources of the increased number of sorties will ultimately be.

Cumulative impacts of the proposed actions are entirely missing from the discussion. The USAF has produced two distinct documents with overlapping problems and overlapping impacts, therefore illegally "segmenting" NEPA compliance. According to the National Environmental Policy Act (NEPA), federal agencies must "Integrate the requirements of NEPA with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively." [40 CFR, Ch. V, 1500.2 (c)] The draft EIS for the Proposed Expansion of German Air Force Operations at Holloman AFB and the EA for the Proposed Airspace Modifications to Support Units at Holloman AFB must be addressed in a single, comprehensive document to comply with NEPA and to make it possible for the public to assess the true impact of the proposed actions. The DEIS's "Cumulative Impacts" section on cultural resources is not a useful assessment of cumulative impacts. Indeed, it is misleading in that it merely theorizes about cumulative impacts rather than providing estimates of real impacts. Similarly, the airspace modifications proposed a year ago will need to be reconsidered with the new knowledge that not 12 but 42 Tornado jets and expanded

WJ-280

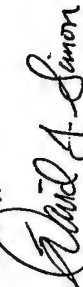
sorties will be flying these same routes. Determining cumulative impacts is made nearly impossible due to the sheer length of these cumbersome, unmanageable documents.

Given these fundamental problems with the DEIS and the EA, I am attaching NPCA's previous comments, virtually all of which apply to this EA. NPCA requests that the USAF consider these comments and incorporate both USAF proposals into a single, concise document that addresses 1.) impacts from the proposed airspace modifications and the introduction of 42 Tornado jets 2.) reasonable alternatives and 3.) all possible mitigation.

In addition to our previous comments, NPCA opposes the proposed lowering of the flight floor and increased number of sorties of Instrument Routes (IRs) 192 and 195 and the addition of the Talon Low MOA. These routes are adjacent to Park Wilderness areas, which are already disrupted by stray flights and noise impacts due to the proximity of flight corridors. Any future documents produced by the USAF need to provide data on stray flights. Furthermore, the USAF should move IR 192 and 195 to avoid these Park Wilderness areas.

We look forward to seeing the USAF address these concerns and comply with NEPA. Thank you for considering the views of the Association.

Sincerely,



David J. Simon
Southwest Regional Director

enclosures

cc (without enclosures):

Thomas McCall, Deputy Assistant Secretary of Air Force
Fred Pease, USAF Pentagon
Larry Henderson, Guadalupe Mountains National Park
Frank Deckert, Carlsbad Caverns National Park
Glenn Fuller, Salinas Pueblo Missions National Monument
Dennis Vasquez, White Sands National Monument
Steve Oppermann, NPS/Intermountain Field Area

WJ-276

WJ-277

WJ-278

WJ-279

WJ-280

National Parks and Conservation Association

SOUTHWEST REGIONAL OFFICE

DAVE SIMON
Regional Director

July 25, 1997

Capt. Lawrence Cox, Director
Public Affairs Office
49 Fighter Wing/PA
490 First Street #2800
Holloman AFB, NM 88330-8287

Dear Capt. Cox:

Thank you for sending the National Parks and Conservation Association (NPCA) the final Environmental Assessment for the Proposed Airspace Modifications to Support Units at Holloman AFB. NPCA is extremely disappointed that the USAF has largely ignored our extensive comments on the draft EA. It is apparent from the current EA that the USAF has not considered most of NPCA's comments from our letter of August 30, 1996 (enclosed). We therefore disagree with the USAF's Finding of No Significant Impact (FONSI). As in August 1996, we must again request that the USAF withdraw the EA and undertake one that is more thorough and that considers our concerns and those of other organizations, including the National Park Service.

According to the Minimum Selection Criteria, the proposed action must, "to the extent practicable, minimize impacts to known sensitive sites (e.g. National Parks, Wildlife Refuges, etc.)" It does not appear that the USAF has made more than a cursory attempt to even consider, let alone minimize, impacts to such sensitive areas. The content of our August 1997 letter is, almost in its entirety, as applicable to the current EA as it was to the draft EA. What follows is a summary of NPCA's key comments and the current EA's response:

1. One of NPCA's chief concerns in our initial examination of the draft EA was the impact of the proposed low-altitude overflights on natural quiet at Guadalupe Mountains National Park, Carlsbad Caverns National Park, and Big Bend National Park. No mention is made of natural quiet in the EA and the same flawed measuring



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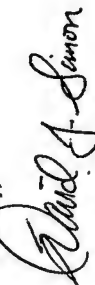
tools are used to justify sound levels. Average sound level (L_{Amax}), continues to be used in conjunction with sound exposure level (SEL), but as NPCA pointed out, these measurements do not measure the actual impact of overflight noise on people and animals. The USAF's disregard is pointed out in the statement (p. 4-9) that "the highest sound exposure a person could experience under the proposed action is 114 dBA, for about 1-2 seconds." This is an extremely high noise level, and the 1-2 seconds at 114 dBA plus the fade-in and fade-out time (of which no mention is made) are sure to disrupt the natural quiet that draws people to parks like Big Bend and Guadalupe Mountains. Furthermore, without the necessary data on the lack of background noise in these areas, the EA cannot be considered a useful tool in gauging the impact of the proposed overflights.

2. Both in public meetings and in NPCA's comments, disturbances to wildlife and livestock were cited as a major concern. While claiming to recognize these concerns in the EA, the EA in actuality does little more than list a series of studies and their disparate claims (4.1.6.4). While NPCA hoped that the USAF would consider more current studies, including the 1992 and 1989 studies we cite, the EA does not even attempt to integrate the findings of the very studies (dated 1960 and 1972), that it cites. The EA fails to weigh even these considerations in its decision and it offers no statement to explain this ignorance of the very facts that it presents. The EA ignores even NPCA's most basic questions: How does the USAF define "insignificant" and who determines this?
3. NPCA expressed concern at the EA's lack of current information in its evaluation of airspace modifications. NPCA cited the 10,000-acre expansion planned at Guadalupe Mountains National Park as an example of conditions that the EA failed to acknowledge. NPCA is pleased that the USAF has modified the proposed overflights to avoid this area, although NPCA does not favor the modified flight path, which is directly adjacent to the western edge of the park, an area that is slated to provide backcountry camping and hiking experiences. Had the USAF adhered to NEPA guidelines (specifically 40 CFR, Sec. 1501.7), resource management specialists at Guadalupe Mountains and other national parks in the region would have been included in the scoping process, thereby avoiding the USAF the embarrassment of routing flights over a national park. We hope that the USAF will consult the National Park Service in the future on all matters in and around national parks. While the flights have been moved adjacent to Guadalupe Mountains National Park, questions about noise levels within the park caused by these overflights and the likelihood of stray flights into the park are still not addressed, and should be.
4. NPCA recommended that the USAF raise the proposed minimum altitude of 100 feet, in some areas if further noise reductions would be achieved.
5. NPCA found that the EA misrepresented the status of McGregor Range's Otero Mesa Chihuahuan desert grasslands, to which airspace modifications were linked. Contrary to the EA's calling these grasslands a bombing range, the permanent availability of these lands for this purpose has, to our knowledge, not been established.

Given these major oversights in its final EA, NPCA is understandably disturbed. The USAF has ignored NPCA's concerns and those of NPS resource specialists. Throughout the EA process, the USAF has demonstrated a profound lack of concern for our national parks.

Since the EA devotes so little attention to these well-established national parks, we remain concerned with the potential impacts of the airspace modifications on less well-known natural and cultural resources in the region. The final EA has not been fundamentally altered. Some modifications have been appended to the draft EA, but these changes do not reflect the many failings of the EA.

Sincerely,



David J. Simon
Southwest Regional Director

enclosure

cc: Thomas McCall, Deputy Assistant Secretary of Air Force
Fred Pease, USAF Pentagon
Larry Henderson, Guadalupe Mountains NP
Frank Deckert, Carlsbad Caverns NP
Steve Oppermann, NPS/Intermountain Field Area

National Parks and Conservation Association SOUTHWEST REGIONAL OFFICE

August 30, 1996

Capt. Lawrence Cox
Director
Public Affairs Office
49 Fighter Wing/PA
490 First Street #2800
Holloman AFB, NM 88330-8287

Dear Capt. Cox:

Thank you for giving the National Parks and Conservation Association (NPCA) the opportunity to comment on the Environmental Assessment for the Proposed Airspace Modifications To Support Units at Holloman AFB, NM. NPCA is a 450,000-member, nonprofit citizens organization dedicated to the protection and enhancement of the National Park System.

NPCA's chief concerns relative to the proposed airspace modifications center on their potential impacts on Big Bend National Park, Guadalupe Mountains National Park, and Carlsbad Caverns National Park. These sites are extremely important national and cultural resources that should be maintained in as pristine a state as possible.

The special status of national parks and other protected areas with regard to overflights was recognized by the 10th Circuit Court of Appeals on July 7, 1993. The Court ruled in NPCA et. al. vs. Federal Aviation Administration (FAA) et. al. that the FAA must analyze aircraft overflight noise over national parks, to determine whether the noise will have a "significant adverse impact" on the experience of park visitors. The FAA was instructed to base that determination on rational standards and empirical data, and was admonished for having improperly "substituted its subjective evaluation for that of recreational users instead of attempting to ascertain the actual impact on the users themselves." If a significant adverse impact was found, the FAA was told to comply with the rigorous park protection requirements of the Department of Transportation Act and the Airport and Airway Improvement Act, requiring the FAA to demonstrate that there were no prudent and feasible alternatives to the project. The Court emphasized that "all reasonable steps"



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to avoid or mitigate any adverse impacts were required. NPCA considers this the standard and has read the present EA with this in mind.

After reviewing the EA, NPCA can only conclude that the proposal for expanding the number of low-level flights from Holloman AFB and the initiation of training activities of German Air Force (GAF) PA-200 Tornado jets needs to look much more carefully at the potential impacts on the resources at these national parks. Given how little attention the EA devotes to these well-established national parks, we are understandably concerned with potential impacts of the modifications on other, less recognized and well-known natural and cultural resources. On the whole, we find that much of the information included in the EA is inadequate, ignoring some factors and misrepresenting others.

Although the community of Carlsbad is cited in the EA, virtually no mention is made of Carlsbad Caverns National Park. Has the Air Force considered the impact of overflights in this area on the park? How will vibrations from the increase in overflights and the lower altitude of these flights affect Carlsbad Caverns' sensitive ecosystem?

While flights are not being routed directly over Big Bend National Park, the resource management specialists and park superintendent were not among those listed as receiving a copy of the EA. The proximity of Big Bend National Park to the flight corridors warrants their inclusion among the recipients of all such communications. Furthermore, given the number of NPS units in the vicinity of the proposed airspace modifications, NPS expertise from Big Bend NP, Carlsbad Caverns NP, and Guadalupe Mountains NP should be included in the planning process.

Both IR-102 and IR-141 are shown as adjacent to Guadalupe Mountains National Park. Although IR-102 and IR-141 do not go directly over Big Bend National Park, they do pass within 20 miles of Big Bend. According to the EA, noise levels on the proposed consolidated IRs, while meeting compatibility guidelines for all land uses, "may not be typical of rural residential areas where ambient noise levels are very low...Consequently, underlying scattered residences and ranches may perceive this new source of aircraft noise specifically in...areas immediately west and south of Guadalupe National Park (L_{den} 53)." (4-9). The EA concedes that "this may be perceived as annoying by some persons in areas where there is no pre-existing military aircraft overflight, particularly in parks and areas preserved for pristine characteristics and public enjoyment." (4-10) It is precisely these areas that we are concerned about, as even moderate amounts of noise damage the visitor experience. Although the EA concludes that "Potential incompatible noise levels

and low-level overflight could affect recreation and sensitive wildlife areas in the Guadalupe District of Lincoln National Forest and Brokeoff Mountains WSA" (4-15), the Air Force dismisses this as insignificant. Why are these impacts insignificant? The very mandate of the NPS is undermined with the introduction of low-level flights and increased overflights in these sensitive areas. This is not "insignificant."

The EA summary indicates that biological resources including protected species "are not likely to be significantly impacted by the proposed action." In the very same paragraph, the EA states that "Potential overflights of Mexican spotted owl critical habitat, bald eagle winter roosts, potential northern aplomado falcon habitat, and potential peregrine falcon habitat would occur. Potential overflights of bighorn sheep along a portion of IR-102/141 in Texas could result in some responses, but the overall impact is expected to be insignificant." (p. S-5) Again, what is "insignificant" and who determines this? Bighorn sheep are dramatically impacted by the presence of military jet aircraft. Even at 5,000 feet, military jet aircraft cause an accelerated heart rate in bighorn sheep. (G.W. Workman et al, *Sonic Boom and Other Disturbance Impacts on Bighorn Sheep*, 1992) The presence of helicopters has been linked to bighorns' decreased food intake (due to interruption). With military jet aircraft flying at 3,000 feet or less, bighorn sheep are known to undergo behavioral changes and leave the area. (R. E. Lamp, *Monitoring the Effects of Military Air Operations at Fallon Naval Air Station on the Biota of Nevada*, 1989) Eagles, falcons and other birds of prey exhibit similar alarmed behavior when exposed to overflights, flying from their perches or nests. (C.M. White and S.K. Sherrod, *Advantages and Disadvantages of the Use of Rotor-Winged Aircraft in Raptor Surveys*, 1973).

Clearly, many impacts, including long-term changes in behavior and cumulative effects, remain unknown. We do know, however, that nesting habits may be altered as birds are severely stressed by overflights. Large mammals scatter and run for cover or even stampede when a sortie passes. The U.S. Fish and Wildlife Service has documented a large variety of stress reactions among mammals in response to noise levels commonly produced by low flying military aircraft, including the disruption of mating and nesting rituals, reduced lactation, and elevated heart rates. While we cannot address all the potential problems and issues, what we do know must be included in the EA. In addition to the present status of wildlife in the region, the EA must look into proposals and plans underway for the reintroduction of wildlife, such as bighorn sheep at Carlsbad Caverns NP. Not only present but anticipated uses must be considered in the EA. All of these concerns must be thoroughly examined before an informed decision can be made.

In addition to wildlife, the general public will be effected by the proposed modifications. Big Bend National Park preserves more than 800,000 acres of the Chihuahuan Desert, the largest protected area of this important ecosystem in the United States. The quiet, austere solitude of Big Bend is one of the park's most significant attractions to its more than 300,000 annual visitors. People value the natural quiet of the park as much as the park's other resources. The Department of the Interior's July 1995 *Report on Effects of Aircraft Overflights on the National Park System* determined that "very low sound levels in many parks allow non-indigenous sounds, such as aircraft, to be clearly audible even at great distances." (p. 85) Along with cultural and natural resources, the National Park Service seeks to protect the less tangible resource of natural quiet as part of its mandate. The natural quiet of Big Bend NP, Guadalupe Mountains NP, Carlsbad Caverns NP, and other protected areas, will be disturbed by the proposed modifications in Air Force flights from Holloman AFB. This is significant.

The EA does not effectively explain the lack of background noise data. Much of the land to be overflown is noteworthy and valued for the relative absence of noise. The proposed airspace modifications would dramatically change these conditions. The EA does not measure the lack of noise in the majority of areas to be overflown by low-level aircraft. The EA needs to address this issue.

The EA does not contain the most current information in its evaluation of airspace modifications and national parks. In considering the impact of proposed modifications, the EA should address not only currently protected areas but also anticipated protected areas. Congress authorized the addition of 10,000 acres to Guadalupe Mountains National Park in 1988. In preparing the EA, the Air Force failed to include this 10,000 acre addition, presently being made to the park. The maps in the EA indicating the locations of national parks or monuments are therefore wrong. If the proposed modifications are permitted, the Air Force will be flying directly over the newly acquired gypsum sand dunes on the west side of Guadalupe Mountains National Park. The Air Force's flight modifications will furthermore route aircraft right over proposed wilderness areas of Guadalupe Mountains National Park. The Air Force must consult with the NPS before deciding where it would like its flight paths to go, taking care to ensure that current and future land uses are taken into consideration. We hope that the Air Force researched other components of the EA far more carefully than it did the situation at Guadalupe Mountains NP.

Mitigation Management Procedures listed in the EA indicate that "Initially, each military training airspace area, when practicable, is designed to avoid sensitive underlying land uses, natural areas, and objects or facilities that may pose a hazard to flight safety. This is accomplished by aerial surveys of proposed airspace areas and examination of existing maps." (p. 2-11) These studies have not been done, according to the EA. Given the absence of this crucial information, how can an informed decision on the proposed modifications be made?

Public safety is inadequately addressed in the EA. Park managers have a number of safety concerns vis a vis aircraft overflights in national parks. At Big Bend National Park, visitor and staff safety due to aircraft overflights were a few years ago already perceived as a "serious problem," with low-flying jets specifically cited as the major concern. With an increase in overflights, the potential for collisions with other planes (military, general aviation, sightseeing, and administration aircraft) jumps. In addition to the potential for crashes, other dangers such as trail horses spooked by low-flying aircraft and accidental fires in grasslands also increase. The EA fails to sufficiently evaluate these and other safety concerns.

In 1990, the Air National Guard (ANG) instituted an overflights policy on federally designated wilderness and wild and scenic rivers that required ANG units to plan new airspace in a manner that considers these areas sensitive and strives to avoid them whenever possible. If avoidance is not possible, overflights are permitted at 2,000 feet above ground level or higher. This concurs with the Federal Aviation Administration's (FAA) recommendation that 2,000 feet be the minimum altitude for flights above national parks. The U.S. Navy policy on "noise sensitive areas" goes even further, recommending a minimum altitude of 3,000 AGL. NPCA would like to see Holloman AFB comply with these recommendations.

At the very least Holloman AFB should raise the current minimum altitude of 100 feet, which is extremely intrusive and dangerous. According to the EA, "to avoid sensitive uses and wildlife habitat," the flight corridor that passes between Carlsbad Caverns and Guadalupe National Park "has an elevated floor level of 9,800 feet MSL." (p. 3-24) This is a misleading statement. Although couched in terms of "sensitive uses," the fact of the matter is that the Air Force will still be flying at low altitudes relative to the landscape here, which is dotted with peaks such as El Capitan at 2,000 feet and Guadalupe Peak at 8,751 feet. Clearly, a floor level any lower than 9,800 feet would neither be practicable

nor safe. Indeed, we question how safe and how quiet flights at a 9,800-foot MSL would be, given the height of the mountains in the area.

Also misrepresented in the EA is the status of McGregor Range's Otero Mesa Chihuahuan desert grasslands. Airspace modifications presented in the EA are linked to the use of McGregor's grasslands as a bombing range. The availability of these lands for this purpose has not been established, notwithstanding the existence of plans for a tactical target range to be constructed on McGregor. The IR-135 and IR-195 routes do not lead to an existing bombing range, but to the Otero Mesa grasslands. The EA falsely indicates the presence of a bombing range on McGregor. What *does* exist on McGregor is ignored: four officially recognized Areas of Critical Environmental Concern (ACECs) and a Wilderness Study Area (WSA). McGregor is not military deeded land. It is temporarily withdrawn under joint management with the Department of the Interior, Bureau of Land Management. We strongly object to the use of these ACECs and WSAs as a bombing range. McGregor's employment as a bombing range is not a foregone conclusion. In addition to recognizing the actual rather than the desired status of these lands on McGregor Range, the EA must examine the potential impacts on natural resources in these areas, including spotted owls, geologic formations, and archaeological and historical sites. Furthermore, all socio-economic impacts have been ignored. These need to be addressed, especially grazing loans.

The present EA does not indicate existing training routes in restricted airspace over U.S. Army Fort Bliss and White Sands Missile Range. These alternative sites must be addressed in the EA. The present EA inadequately addresses the many concerns that the proposed airspace modifications raise. Alternative locations and airspace requirements must be included.

Equally important is the need to include information on existing military training, joint forces multinational exercises and joint forces programs in the region. Any modifications must fully consider existing activities in the area and provide data on the cumulative impacts that the combination of all of these activities will have on the many important cultural, natural, and historical resources in the area. Without such a thorough assessment of activities already taking place in the region and without an evaluation of the impact of these combined activities, the EA is without value as a tool for policy planning and implementation.

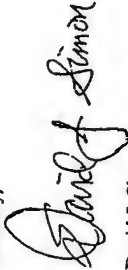
The National Environmental Policy Act (NEPA) requires that related actions be addressed within a single document. The EA fails to do this, and therefore overlooks potential environmental dangers. The German government and the U.S. Air Force must comply with these provisions of NEPA. Failure to do so results in an assessment process that merely pays lip service to environmental questions and public concerns.

We encourage Holloman AFB to design a set of viable alternatives for meeting the Air Force training mission. These alternatives should include options for shifting training operations to bases other than Holloman AFB, as well as options for managing training operations from Holloman in ways that minimize the impacts on Big Bend National Park, Guadalupe Mountains National Park, and Carlsbad Caverns National Park, or eliminate impacts altogether. Consideration should be given to relocating training operations away from these sensitive areas rather than inviting the GAF to fly in the region.

In summary, the present EA is inaccurate, uninformed, and incomplete. Environmental concerns, public safety issues, existing land uses, and alternatives are largely unaddressed or misrepresented. NPCA believes that this EA should be withdrawn and a new EA that takes these problems into consideration be drafted for review. Few things are as disruptive to the wildlife, natural quiet and opportunities for solitude in our national parks and wilderness areas than the scream of military jet engines flying at treetop level on maneuvers. The presence of military aircraft in these places is a contravention of the purpose for which the National Park Service Organic Act and the Wilderness Act were written.

We look forward to seeing Holloman AFB address these concerns. Thank you for taking the time to consider the views of the association.

Sincerely,



David J. Simon
Southwest Regional Director

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 8/6/97

PLEASE PRINT -

Ms. Parker: It is imperative
that the expansion of the German
Air Force be successful in Alamogordo &
Otero County N.M. For the U.S. as the
leader in the free world to be able
to lead & trail foreign countries in
democracy & a continuing free world &
for leadership & to deny the expansion
of the German facilities would send
all over message to the world that
we are again an isolated country.
On top of all of the above
for Cincee, W 5 M A, Holloman AFB, Alamogordo
& Otero County economy depends on the
military economy. Our contribution
will be appreciated & as you can tell
I am in support of the situation

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: John D. Stowe
 ADDRESS: 181 Westgate
 CITY: Las Cruces, New Mexico 88005
 STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
 HQ ACC/CEVA
 ATTN: MS. SHERYL PARKER
 LANGLEY AIR FORCE BASE, VA 23665-2769

American

Moving & Storage, Inc.
 1102 Hwy. 70 West
 P.O. Box 275
 Alamogordo, NM 88310
 (505) 437-5630

August 6, 1997

Air Combat Command Environmental Analysis Branch
 HQ ACC/CEVA
 Langley AFB, VA 23665-2769
 ATTN: MS SHERYL PARKER

Dear Ms. Parker:

I am writing to support the planned expansion of German Air Force training at Holloman AFB, (Holloman II) and the development of a Tactical Target Complex on the McGregor Range. The German Air Force members and their families are contributing both economically and culturally to Alamogordo and Otero County. I am glad they are here and strongly support the expansion of their operations.

Also, I strongly believe Holloman AFB should have their own bombing range, and the range should be placed at the most operationally advantageous location to both the German Air Force and current and future United States Air Force operations.

Additionally, I support the continued withdrawal of BLM lands for the McGregor range. These lands are critical in allowing Otero County to support military training and exercises, and also will help in locating the Tactical Target Complex. These lands should be withdrawn for an extended period of time (50 or more years) if not permanently, to allow development of new resources and their long term use.

Holloman AFB is critical to Alamogordo's economy. Our ability to capably host the German Air Force will set the stage for future Holloman missions and prove our ability to meet the United States Air Force's future needs. Alamogordo and Otero County have already invested both time and money into

SERVING SOUTHEASTERN NEW MEXICO

1102 Hwy. 70 West
 P.O. Box 275
 Alamogordo, NM 88310
 (505) 437-5630

901-903 East 19th Street
 P.O. Box 1268
 Roswell, NM 88201
 (505) 622-3050

2113 French Drive
 P.O. Box 5958
 Hobbs, NM 88241
 (505) 393-1197

UNITED
UNITED
UNITED
 Van Lines

Page 2

this effort. Please support the German Air Force expansion, the development of Holloman's own bombing range and the continued withdrawal of the entire McGregor Range area.

Sincerely Yours,



Richard Robling
Vice-President

RR/mjp

805 Weeden Island Drive
Niceville, FL 32578
7 August 1997

Dear Ms. Parker:

As property owners in the San Mateo mountains of NM, we strongly object to the proposed low level overflight of the German Tornado aircraft from Holloman AFB. We currently experience the low level flights of F-16 and other aircraft in our canyon, and though these incidents are relatively infrequent, the events are disconcerting. Based on these experiences, we feel that it is an imposition on our solitude for the U.S. Air Force to allow the training/test flights of the German aircraft. In addition, we have not seen results of any scientific tests that would show that there is no negative impact of such activity on livestock and wildlife.

WJ-282

Perhaps the German tests should be accomplished where we feel they belong - in Germany.

Regards,



Peter J. and Regina M. Naumnik

*Draft Environmental Impact Statement
Expansions of German Air Force Operations at
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: August 8, 1997

As an active and involved citizen of Alamogordo and Otero County, I fully support the planned expansion of the McGregor Range to accommodate the German Air Force training program at Holloman Air Force Base.

The development of a Tactical Target Complex on McGregor Range is necessary for the expansion of the German Air Force's training program.

Holloman Air Force Base is the life blood of Alamogordo and surrounding communities.

The increased revenues from the German's presence certainly does and will enhance the quality of life for everyone living in the communities surrounding Holloman.

I strongly support the German Air Force expansion (Holloman II) and the development of Holloman's our bombing range on BLM land and Otero Mesa.

*****CONTINUE ON BACK FOR MORE SPACE*****

NAME: Robert Hamilton
ADDRESS: 500 Tenth Street
CITY: Alamogordo
STATE/ZIP CODE: New Mexico, 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement ()

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH

HQ ACC/CEVA

ATTN: MS. SHERYL PARKER

LANGLEY AIR FORCE BASE, VA 23665-2769

GOVERNOR
GARY E. JOHNSON



**STATE OF NEW MEXICO
DEPARTMENT OF GAME & FISH**

Wildlife Building
P.O. Box 25100
Santa Fe, NM 87104

DIRECTOR AND SECRETARY
TO THE COMMISSION
Gerald A. Marasciulli

Visit our Web Site home page at <http://gmfish.state.nm.us>
For basic information or to order free publications, 1-800-865-9310

STATE GAME COMMISSION
William H. Boudreau, Chairman
JAN 1997

Gov. Ryan
Silver City, NM
Dr. William E. Schuler
Albuquerque, NM
Steve Padilla
Albuquerque, NM
Dr. Charles Meyer
Albuquerque, NM
George A. Ortega
Farmington, NM
Steve F. JNN

August 8, 1997

U.S. Air Force
Headquarters Air Combat Command
CEVA, 129 Andrews Street
Langley AFB, Virginia 23665-2769

To Whom It May Concern:

The New Mexico Department of Game and Fish has reviewed the draft EIS for the Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico. This proposal involves basing 30 additional German Air Force Tornado aircraft and 640 personnel at Holloman AFB, construction at Holloman AFB, and establishing a training unit for German aircrews. Two of the training alternatives presented involve building a new target complex (NTC) for dropping inert munitions; one proposed site is on western Otero Mesa on McGregor Range, the other proposed site is in the Tularosa Basin portion of McGregor Range.

Either proposed site would involve construction of roads and clearing vegetation for a complex of bomb targets. Some of the proposed construction is in desert grassland, some is in desert scrub habitat. At either site, "less than 5200 acres" would be disturbed (p. ES-6). Page 2-26 states that "It is assumed that the entire impact area (5120 acres) would be disturbed by construction" (for either site). Table 2.4-1 on page 2-60 states, however, that for the western Otero Mesa site, about 500 to 1040 acres of vegetation and wildlife habitat would be lost to construct, maintain, and use the NTC; all 5120 acres of vegetation and wildlife habitat would be disturbed if the Tularosa Basin NTC site is chosen. We recommend that these apparently contradictory statements, and others on page 4-58 that also address acreage disturbed, be reconciled in the final EIS.

Desert grassland habitat is less common, and more productive wildlife habitat than is desert scrub. The Department does not necessarily concur with the conclusion on page ES-6 that disturbance of 5120 acres at either site would be insignificant.

Table 2.4-1 points out that for the west Otero Mesa site, "Remaining undisturbed habitat in NTC may be improved because of protection from livestock grazing." We agree that

W-283

W-284

U.S. Air Force

2.

August 8, 1997

the potential for that improvement in ecological condition to occur does exist, but other than this statement, no substantial mitigation for loss of, or impacts to, desert grassland habitat is proposed in the document. We recommend that the Air Force consult with conservation ecologists at the Directorate of Environment at Fort Bliss to seek and implement measures to restore grassland habitat, to mitigate impacts to or loss of such habitat by this proposed project, regardless of which alternative is chosen.

We appreciate the opportunity to review the draft EIS, and hope these comments are helpful in the revision of the document. If you have any questions, please call Bob Wilson at (505)827-7827.

Sincerely,



Andrew V. Sandoval, Chief
Conservation Services Division

AVS/BW/dt

xc: Jennifer Fowler-Propst (Ecological Services Supr. USFWS)
Mike Bell (Southeast Area Operations Division Chief, NMDGF)
Jim Bailey (Asst. Cons. Services Division Chief, NMDGF)
Bob Wilson (Habitat Specialist, NMDGF)

Squash Blossom

822 N. WHITE SANDS BLVD. • ALAMOGORDO, NEW MEXICO 88310
(505) 437-8126

C.R. Hall
8-12-97

RE Steno mesa/Holloman Target Complex
with the two county Commission and the
Public land use advisory Weighted with
Rancher Interest, too much focus and
Fuss is being made over the cows.
I Dave Say the bombs wont do
as much harm to the desert country
as the cows. It will probably improve
it.



*Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico*

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 8/12/97

HOLLOMAN AIR FORCE BASE IS ABSOLUTELY THE MOST DRIVING FORCE IN OUR ECONOMY HERE IN ALAMOGORDO AND OTERO COUNTY.

IT IS IMPERATIVE THAT MISSIONS ASSIGNED TO HOLLOMAN NOT BE STRANGLED BY JUST A FEW PEOPLE TO THE DETERMENT OF THE MAJORITY.

SPACE IS NEEDED AND SPACE IS AVAILABLE THAT WOULD SERVE THE MAJORITY OF PEOPLE. THE MAJORITY OF THE PEOPLE IN THIS AREA ARE DEPENDENT ON HOW WELL HOLLOMAN DOES.

THE BEST USE OF PUBLIC LANDS WOULD BE TO ALLOW THE SPACE FOR NEEDED BOMBING AND TEST RANGES.

PLEASE DON'T INTERFERE WITH OUR LIVELIHOOD.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: JERRY YATES OWNER THE INK WELL, INC.
ADDRESS: 2304 PINE DRIVE
CITY: ALAMOGORDO, NM 88310
STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

August 13, 1997

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

As a property owner and a business owner in Otero County I would like to express my strong support for the planned expansion for training operations at Holloman Air Force Base (Holloman II) and the development of a dedicated bombing range to support future USAF missions at Holloman Air Force Base in Otero County.

I am convinced that the best use for the MacGregor Mesa is continued involvement and multi-use by Holloman Air Force Base and any other uses which don't interfere with Holloman Air Force Base.

Holloman Air Force Base is still down 3,000 to 4,000 jobs from its peak. Without the additional training opportunities there would be no way for Holloman to get back up to what it once was. This expansion would certainly boost the sagging economy in Otero County.

I sincerely hope the Environmental Analysis Branch will take my comments under consideration and will come back with a favorable impact statement on our community and Holloman Air Force Base.

Thank you.

Sincerely,

Mary Ann Shaw

Mary Ann Shaw
Owner, The Quality Water Store

AUREY DUNN
PO Box 450
Alamogordo, New Mexico 88002

August 13, 1997

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

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I sincerely hope the Environmental Analysis Branch will take my comments under consideration and will come back with a favorable impact statement on our community and Holloman Air Force Base.

Thank you.

Sincerely,
Betty Jo Dunn
Betty Jo Dunn

BJD:ld

August 13, 1997

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

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I am convinced that the best use for the MacGregor Mesa is continued involvement and multi-use by Holloman Air Force Base and any other uses which don't interfere with Holloman Air Force Base.

Holloman Air Force Base is still down 3,000 to 4,000 jobs from its peak. Without the additional training opportunities there would be no way for Holloman to get back up to what it once was. This expansion would certainly boost the sagging economy in Otero County.

I sincerely hope the Environmental Analysis Branch will take my comments under consideration and will come back with a favorable impact statement on our community and Holloman Air Force Base.

Thank you.

Sincerely,
Ralph V. Dockray
Ralph V. Dockray, Owner
Ralph V. Dockray CPA

MOUNTAIN APPLE COMPANY

A LIMITED PARTNERSHIP
P.O. BOX 355
ALABAMA 35003-0355
(205) 437-7623

Ms. Sheryl Parker
Page 2
August 13, 1997

August 13, 1997

Air Combat Command
Environmental Analysis Branch
HQ ACC/CEVA
Attn: Ms. Sheryl Parker
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

As owners of property in Otero County, we would like to express our strong support for the planned expansion for training operations at Holloman AFB (Holloman II) and the development of dedicated bombing range to support future USAF missions at Holloman Air Force Base as well as the German Air Force Training.

We are convinced that the best use for the MacGregor Mesa is continued involvement and multi-use by Holloman Air Force Base and any other uses which don't interfere with Holloman Air Force Base.

Some of the statements opposing this are being made by primarily ranching groups. There are so few families involved it is frightening to witness all the commotion they are making and the visibility they have received.

Some of the ranchers feel they'll have the opportunity, within two or three years, to have total withdrawal. They feel they will regain use and have this land turned back to them for personal ranching interests. This thought is based on the Taylor grazing Act which has a lot to do with watering for the cattle.

In addition, some people who have objected to flight patterns and flyovers have failed to mention that the majority of the land being ranched is either United States Bureau of Land Management or New Mexico state owned grazing land which they have leased at a very reasonable fee. They certainly do not own any air rights with their grazing leases.

Holloman Air Force Base is still down 4,000 jobs from its peak. The 600 German jobs under this proposed Toronado Bed Down would certainly boost the sagging economy in Otero County.

We sincerely hope the Environmental Analysis Branch will take these comments under advisement and will come out with a favorable impact statement on our community and Holloman Air Force Base.

Thank you.

Sincerely,



Kelly O. Dunn
Limited Partner
Mountain Apple Company

KOD:ld

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: Aug. 14, 1997

Thank you for your input.

PLEASE PRINT

We are in favor of the expansion of German Air Force operations at Holloman Air Force Base near Alamogordo, New Mexico. Our environment is to be used but not abused.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Charlie N. Cookson, Sr.
ADDRESS: 2307 Willow Dr.
CITY: Alamogordo, New Mexico 88310
STATE/ZIP CODE: _____

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Dear Mrs. Parker

Thank you so much for your quick response. I received the book 2 days from the time I talked to you. I only wish my letter could have reached you sooner. The first 2 nights, I couldn't put it down. I read up until 3:30 A.M. 2 mornings in a row. My son came in and lots of company, and I had no other chance of looking it over, except in bits & pieces. I plan to continue reading the book now that I am free, but so far it doesn't look good for any area, the impact it would have on the environment.

Also I ask that you would forgive the handwritten letter, as I have no way to type it.

Thank you
Mrs. Charline Ripley

Dear Sirs
 in looking over the proposal doesn't anyone find it strange that the German air force wants to take command of the only protective missile range we have, and we are just handing it to them. Why with our missiles now move how did they penetrate into our only defenses? We have been steadily closing military bases all over the country. Also is the United States aware of the possibility of a computer breakdown in the year of 2000. Scientist already are working on it to protect the computer from some outside virus. Because with a computer breakdown there would be no communication and the United States would be completely immobilized. They don't install enough need, and now they are worried that many of our things won't work in the year 2000.

Cattle grazing in any given area would be extremely frightened by the noise, and this is cattle country. In fact ranching and Beef Cattle are the living in

This area. On roundups when cattle are frightened, they scatter in all directions they run through fences, and are badly cut up as all ranches are contained with barbed wire, which is a very wicked wire, also cattle that runs, it heats the blood and ruins the meat, because the blood goes into tiny blood vessels & penetrates the flesh. It is even known that cows sometimes hold back their milk and the chickens stop laying their eggs. Animals are frightened very easily, plus the fact that I have been over by Marfa when low flying aircraft passed overhead low enough that if you were standing on top of a tall ladder, you could have almost touched them. This is in the Pinto Canyon Range, and a very frightening experience. They were the old Bomber planes from world war II my Dad worked at the Marfa air force base and I recognized them immediately. Very dark green in color, which brings me to another point, a year or so ago Solid

~~The~~ Helicopters use to fly in late every evening from down south. I never could find out where they were from, or where they were going, also between Ft Stockton and Alpine. I saw a low flying plane which looks very much like the tornado on the fact sheet. It was black in color. It came very low overhead and appeared to land just out of sight. I pulled to the side of the road and tried to spot it with my binoculars. I never saw it again. I told a flight instructor about it that very day, and he said they monitored every plane in the area, and they had no such plane around but several times since, I have seen them, 2 other times, just above the mountains and flying very low, always black in color.

I'm reading about the emissions they would be very harmful to the area, or any area it which it would settle, eventually it would kill the vegetation

here in Alpine, we use to get beautiful fruit, but no one has had fruit in five years and gardens are very shaggy too. I feel we have been getting black rain for sometime now, due to fallout from emissions or germ warfare. Every month and then there is a kind of sweet sickly smell in the air. In Alpine as well as Ft Stockton Midland and the surrounding towns, and these are like 200 miles away. Ft Stockton only 60. At first people laughed at me when I told them of the odor in the air but now they all agree there is a peculiar sweet smell hanging over our towns from time to time, sometimes coming in very strong, other times very faint. Like undiluted something in the air.

In the year of 1995, some men out of New Mexico, came out to the old Marfa air force base, and they flew over and emitted some kind of

5.

blue gas, as the gas fell it expanded and turned kind of a purplish red. It was a test of some kind, suppose to see what it would do over the ocean, but this was dry land. A friend I was with, suggested we go, since we did not know what it was, and could be dangerous. It spread so rapidly, it seemed to be some sort of secret testing, because the men started leaving immediately. All we could find out from the men at the gate. It was a team out of New Mexico, Ok., and by the way it looked as tho some of the men were wearing rubber suits or fire suits. I guess to protect themselves from the gas or whatever. The wild animals in our area are numerous too, and just recently, a few have begun to return to the area, but grass is scanty, and very hard to grow

6.

in the area, without rainfall it sometimes soaks drought proportions. The emissions, and pollutants from the burning are great, could kill what little grass is struggling to live. Also we are the home for the famous bald eagle, which is becoming very rare in our area. The planes could kill them and the buzzards or vultures clean up along the roadway of dead animals, and birds would be to a minimum. I can't say that vibrations won't be detrimental to any area it flies over. Friends living in the Davis mountains had their windows shattered by an unidentified flying air-craft. and I remember during the first sonic boom, of people telling of broken window panes and other things such as frightened animals, and of one man actually being thrown from his horse. They decided against the sonic boom over this area, my husband says it also cracked & busted the cement water tanks.

7.

We have some archaeological artifacts in our area here. How could this not effect our water supply, when water drains from the top of the ground, to the water basins below, if there is sediment, dust, or emissions from the aircraft, by the sheer admission of gravity, the ground will absorb all foreign particles, and again cattle and wildlife drink from whatever puddle of water they find. How can you protect them from this type of fallout?

W-285

If this would increase the use of Hazardous & Toxic materials they would Hoffman aerospace base want this. There is no safe disposal method, and essentially it would find its way into the water supply. Can our own air-craft use the airspace at Holloman air force base or can the US use it at all, or will the air be so congested with foreign air craft, it would

W-286

8.

ie Hazardous to take to the air, and the level of the LDT. Would make it impossible for our own planes to fly their old route.

W-286

Back to the wildlife again, what about the fish in the rivers and the lakes. The water where they live will be so polluted, they will be unfit for human consumption. If there is no airspace, in Germany. How is the GAF returning to Germany for additional training sorties in Germany. Pg 243.

W-287

Why would the United States allow any land, be war torn, by another country when our people don't destroy it. Why are we building live target ranges in all the strategic places. Why is the G.A.F. adding for target areas only where the missile ranges are & the soldiers training. What about fuel. The American people are already short of fuel. What are we suppose to do for fuel, just let our supply keep dwindling away, and the prices climbing at shot of rate, till we are forced to park our cars. Are we such a rich land we

W-288

9.

Can give it away to be destroyed, why didn't the G.A.F. ask for Colorado. It is full of mountains and ghost towns, miles and miles of it.

How harmful is this UXO. Does the government really know this much about it. What is the impact of it on future generations. In long term speculation is it really safe?

In the Park area at the Big Bend Natl Park, this dates back millions of years. It is a really historical place, dating to the Pleocene + the Miocene era. At one time they were considering excavating a certain area. The ocean once covered the whole area, and uplands pushed up the mountains, creating a fault line, that runs all the way to California, and all the way to the ocean. The land is so old, and so filled with so many interesting things. Many Indians have roamed this area, including the Tolson man, this region is famous for its many Indians including the Mesquite Apache, you can still find petroglyphs + arrowheads by the dozen. Some Petroglyphs in crumbling walls.

W-289

10.

A friend of ours found an enormous turtle shell 12 feet across. My husband and I found an amphibole about 6 feet in diameter. I discovered a mine tunnel 2 was 17 years old, and there was to be the remains of a dino-saver at the Yucca range. so much left to be discovered, that could be destroyed by low-flying aircraft, and emission so much unusual flora + fauna. Patayas, tasting much like strawberries, the Prickly Pear, all species of cactus, these things support the deer, + the wildlife. With Polutants from the emissions, this could soon become barren land, and it should really be preserved, till we discover all we can about it. we are also home to the Savilina or Pecorary, Puma, white tail deer, bald eagle, prairie dog and many others. up around Carlsbad, there is same kind of very large ant, almost colorless but very very large. There are so very many interesting species yet left to discover, we are a chain to evolution, that could ~~could~~ break the chain to history, if we don't protect our environment.

11.

Rumors of old mines abound. Lost and buried treasure. Some silver some gold. I understand it sinks so much per year, because of its weight. Someday they may find a better method of locating it, but if vibrations are strong enough in the area, this too could tumble or be lost. It just isn't healthy or right to take perfectly good land & destroy it to the point of no return, and all the emissions settling over everything. This can't be good for anyone. Animals and humans alike. Let alone the vegetation & everything. Please consider this proposal very carefully. It could totally devastate our land.

Thank you for considering my point of view
 Charline Ripley

JAMES A HAYES
 POST OFFICE BOX 597
 CARRIZO NM, 88301
 505 648 1118
 7/16/97

LANGLEY AIR FORCE BASE
 129 ANDREWS STREET #102
 LANGLEY AIR FORCE BASE VA. 23665 2769
 MS SHERYL K PARKER
 HQ ACC/CEVA.
 Re: Draft Proposed Expansion German Air Force at Holloman Air Force base in New Mexico.

Dear Ms Parker,

As I get started on my thoughts on this I am tickled that you label this a Partnership with the people of this area. I have not heard anyone that is in favor of it for a long list of problems. For my part of it the Army and the Air Force has most of the Land and almost all the Air space in the Carrizozo area now. It you would look at the State Map I am sending with this you will see what I mean. Now you want to have a low level high speed route almost right on hwy 54 that is going to be 100' alt and high speed and by your people German Air Force at 100' and who knows how fast going the same way. Safe not a chance. All the people in this area have had at least one encounter with the low level high speed and again I have not heard anyone say they felt safe. You have been now a great big file on some of the things that have happened and what I do not understand if the Germans want to get along with the local folks why they fly so low and try to spook the cows and sheep and the ranchers and see if they can get some of the homes and windows to crack. And maybe scare the hell out of the livestock.

On the money to be spent all I hear is that it is going to cost The German Airforce 100 Million dollars and only after some tough questions did I hear the truth that it is a 60/40 deal. I have spent almost all of my life looking for a Partner that would let me only ask and they would give. The cold war is over and I my book the next time we need to fight a War it may be just as in the past two wars the Germans again so it makes no sense to me. I can see what they want cheap fuel and people that are not able to tell then what we would hear if this was Germany.

To revive.

1. Money the 100 Million that the Germans say they are going to spend You should tell the truth that it is a 60/40 with us allowing them to buy their fuel at the Airforce price. Have use of the Airforce Base for 800 more people. How much do We have to pay them for the bases we have in Germany? Is it a 60/40 split? I think not.

2. The route they are going to use will make it very unsafe for us to fly as they have only said that they will be no lower than 100' so how high will they go? There is White sands with the big part of the state already and now you want more.

3. Your people want the people that are on the land when the planes are flying low to get the N no I would like to see the person who could do that.

W-290

W-291

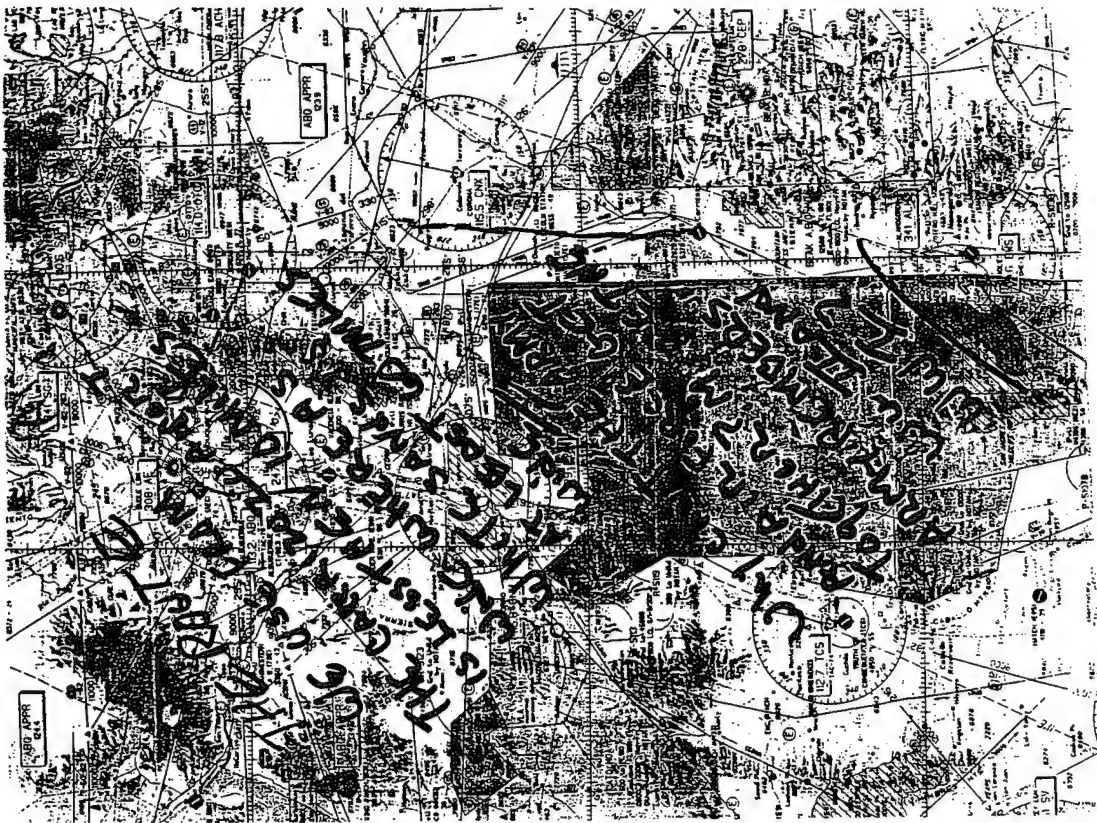
W-292

4. If we have some deal with NATO that would cover this it should be made known. That would be a little bit easier to understand.

For this one man the only way to handle this is with a NO ACTION ALTERNATIVE REPORT !!!

Thank You for at least reading this and if you would like now of my thoughts you have only to ask.

Jim Hayes





United States Department of Agriculture
Forest Service
Apache-Sitgreaves NF
P.O. Box 640
Springerville, AZ 85938
520 333-4301

Areas to be Avoided by Air Force Training Flights

Reply To: 1900
Date: July 18, 1997

Apache-Sitgreaves NF's
Clifton Ranger District

Fire Management facilities to be avoided:

Rose Peak Lookout	T1N R29E Sec. 8	by .5NM
Strayhorse Admin Site	T2N R29E Sec. 2	by .5NM
Strayhorse Helispot	T2N R29E Sec. 11	by .5NM

Other facilities to be avoided:

Strayhorse Campground	T2N R29E Sec. 2	by .5NM
Trail Cabin Admin. Site	T2S R29E Sec. 16	by .5NM

TES species locations to be avoided:

Bringham Peak	T1N R29E Sec. 9, 10	by 1NM
Yam Canyon	T2N R32E Sec. 30,	by 1NM
Blue River Corridor	T1N R31E Sec. 6, 7, 12, 13, 18, 24, 25, 31, 36	by 1NM
Blue River Corridor	T1S R31E Sec. 5, 8, 17, 18, 19, 20, 30, 31	by 1NM
Blue River Corridor	T2S R31E Sec. 5, 7, 25, 36	by 1NM

Dear Ms. Parker:

The Apache-Sitgreaves National Forests have been contacted by Mr. Ted Doerr and asked to provide comment to the Draft EIS for "Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico". Specifically we were asked to provide species impact information and avoidance recommendations for use along VR-176 within the Apache Forest. We would also like to provide location information on areas of concentrated public use and fire related facilities, along with appropriate avoidance margins.

Please find enclosed species lists for both the Alpine and Clifton Ranger Districts giving occurrence and status for various TES species. Also enclosed are lists of facilities and areas of public use and recommended avoidance distances and also maps depicting these locations.

You should also be aware that the Fish and Wildlife Service will be releasing endangered Mexican Wolves in several still undetermined locations adjacent to the Blue Range Primitive Area in the spring of 1998.

While the Blue Range Primitive Area does not have any flight elevation restrictions due to its incorporation in the National Wilderness System, it is customary for aircraft to observe a minimum 2000 foot above ground level altitude while over these areas. We ask that this training program observe this to the extent possible for as you can see there are numerous areas of public use and TES species habitats.

If we can provide further information or assistance we will be happy to do so.

Sincerely,

JOHN C. BEVELL
Forest Supervisor

Enclosures



Caring for the Land and Serving People

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PS-8200-28a (1/95)

CLIFTON RANGER DISTRICT
APACHE-SITGREAVES NATIONAL FORESTS
ENDANGERED, THREATENED, PROPOSED, CANDIDATE, AND SENSITIVE SPECIES
Date of FUS Concurrence: 12/10/96
Host Recent Edit: 12/10/96

CLIFTON JANGER DISTRICT		
APACHE-SITGREAVES NATIONAL FORESTS		
ENDANGERED, THREATENED, PROPOSED, CANDIDATE, AND SENSITIVE SPECIES		
Date of FWS Concurrence: 12/10/96		
Most Recent Edit: 12/10/96		
STATUS OF SPECIES/HABITAT IN ACTION AREA (AA)		
OF PROPOSED PROJECT		
USFWS and USFS	USFWS and USFS	USFWS and USFS
USFWS	USFWS	USFWS
Status	Status	Status
Species	Species	Species
MAMMALS		
<i>Bassariscus astutus</i> Ringtail.....	SEN..	(b) Inhabits canyons and riparian areas.....
<i>Canis lupus baileyi</i> Mexican gray wolf.....	E/SEN..	(b) Residents extirpated; 1998 Reintroduction planned for action area
<i>Chironomys merriami</i> Mexican long-tongued bat. According to Barry Spicer, AGFD, this species might occur on 03.....	SEN..	(b) May occur in alines, caves in action area.....
<i>Euderma maculatum</i> Spotted Bat.....	SEN..	(b) Riparian, water with nearby cliffs.....
<i>Eumops perotis</i> Californian Greater western mastiff bat.....	SEN..	(b) Cliffs with potential roost sites near water.....
<i>Lasiurus blossevillii</i> Red bat (= <i>L. borealis</i> in part).....	SEN..	(b) Inhabits riparian (cottonwood, sycamore) areas
<i>Leptonycteris curasoae vespertilionis</i> Lesser long-nosed bat. According to Barry Spicer, AGFD, this species might occur on 03.....	SEN..	(b) May occur in riparian areas in (lower) elevations
<i>Lutra canadensis</i> spongus Southwestern otter. According to Bruce Palmer, FWS, this species may still occur in the headwaters of the Salt River drainage system.....	SEN..	(c) Recent surveys did not detect species.....
<i>Microtus californicus</i> California leaf-nosed bat.....	SEN..	(b) May occur where mines/caves exist.....
<i>Microtus montanus arizonensis</i> Arizona montane vole.....	SEN..	(b) May occur in high elevation coniferous forests and riparian areas
<i>Mustela nigripes</i> Black-footed ferret. According to Bill Vespelt, AGFD ferret specialist, this species may still occur on the forest in association with prairie dogs.....	E/SEN..	(c) No prairie dogs in action area.....
<i>Myotis lucifugus</i> Occult little brown bat.....	SEN..	(b) Inhabit cottonwood-sycamore habitats.....
<i>Myotis velifer</i> Cave myotis.....	SEN..	(b) Inhabit riparian galleries.....
<i>Neotoma mexicana</i> Coati.....	SEN..	(b) Inhabit riparian woodlands (sycamore, walnut).....
<i>Neotoma mexicana</i> Desert shrew.....	SEN..	(b) May occur in riparian areas.....
<i>Ovis canadensis nelsoni</i> Rocky Mountain bighorn sheep.....	SEN..	(b) Documented in action area.....
<i>Panthera onca</i> Jaguar.....	PE/SEN..	(b) Transients from Mexico possible.....
<i>Peromyscus flavus</i> Goodwillie.....	SEN..	(b) May occur in juniper/desert grasslands.....
<i>Silvery pocket mouse</i>	SEN..	(b) May occur in adjacent cliffs and feed at river
<i>Plecotus townsendii</i> Pale Townsend's (Western) big-eared bat.....	SEN..	(b) May occur in high elevation streams.....
<i>Sorex palustris</i> Northern water shrew.....	SEN..	(b) Inhabit riparian cottonwood galleries.....
<i>Tadarida brasiliensis</i> Mexican free-tailed bat.....	SEN..	(b) May occur in high elevation streams.....
<i>Zapus hudsonius</i> New Mexican (meadow) jumping mouse.....	SEN..	(b) May occur in high elevation streams.....
BIRDS		
<i>Accipiter gentilis</i> Northern Goshawk.....	SEN..	(b) Occurs ponderosa pine, mixed conifer forests
<i>Accipiter striatus</i> Sharp-shinned Hawk.....	SEN..	(b) May nest/forage in ponderosa pine/riparian.....
<i>Buteo albonotatus</i> Zone-tailed Hawk.....	SEN..	(b) May nest or forage along rivers.....
<i>Buteo galinulus</i> Common Black Hawk.....	SEN..	(b) Documented nesting along Blue River.....
<i>Buteo swainsoni</i> Swainson's Hawk.....	SEN..	(b) May occur in grasslands and open country.....
<i>Buteo striatus</i> Green-backed Heron.....	SEN..	(b) May transiently forage in backwaters/Blue R.....
<i>Camerodius albus</i> Great Egret.....	SEN..	(b) May transiently forage along Blue River.....
<i>Ceryle alcyon</i> Belted Kingfisher.....	SEN..	(b) Forages along Blue River.....
<i>Coccyzus americanus</i> Yellow-billed Cuckoo.....	SEN..	(b) May inhabit riparian thickets along Blue River.....
<i>Dumetella carolinensis</i> Gray Catbird.....	SEN..	(b) May occur in woody riparian.....
<i>Egretta thula</i> Snowy Egret.....	SEN..	(b) May transiently forage along river.....
<i>Empidonax traillii</i> extimus Southwestern Willow Flycatcher.....	E/SEN..	(c) No suitable habitat.....
<i>Falco mexicanus</i> Prairie Falcon.....	SEN..	(b) May forage along river; No known eyries in AA.....
<i>Falco peregrinus</i> American Peregrine Falcon.....	E/SEN..	(b) May forage along river; No known eyries in AA.....
<i>Halieetus leucocapillus</i> Bald Eagle.....	T/SEN..	(b) Documented wintering birds along Blue River.....
<i>Himantopus mexicanus</i> Black-necked Stilt.....	SEN..	(b) May occur in backwater/marshy areas.....
<i>Himantopus mexicanus</i> Long-billed Curlew.....	SEN..	(c) No grasslands.....
<i>Myiarchus cinerascens</i> Black-crowned Night Heron.....	SEN..	(b) May transiently forage along river/backwaters.....
<i>Otus flammeolus</i> Flammulated Owl.....	SEN..	(b) May occur in ponderosa pine forests/stringers.....
<i>Pandion haliaetus</i> Osprey.....	SEN..	(b) May transiently forage along river.....
<i>Passerina versicolor</i> Varied Bunting.....	SEN..	(b) May inhabit mesquite thickets along Blue River.....
<i>Phalacrocorax auritus</i> Double-crested Cormorant.....	SEN..	(c) No nesting colonies; No deep-water habitat.....
<i>Plegadis chihi</i> White-faced Ibis.....	SEN..	(b) May transiently forage along river bank.....
<i>Porzana carolinensis</i> Sora.....	SEN..	(c) No extensive marshes.....
<i>Recurvirostra americana</i> American Avocet.....	SEN..	(c) No shallow wetlands with open flats.....
<i>Rhynchopsitta pachyrhyncha</i> Thick-billed Parrot.....	SEN..	(b) May occur in coniferous habitats.....
<i>Strix occidentalis</i> Lucida Mexican Spotted Owl.....	T/SEN..	(b) May transiently forage along river/tributaries.....
<i>Vireo belli</i> Bell's Vireo.....	SEN..	(b) May inhabit riparian mesquite thickets.....
<i>Vireo vicinior</i> Gray Vireo.....	SEN..	(b) May inhabit mesquite/willow along rivers.....
REPTILES		
<i>Hemidactylus suspectus</i> Gila monster.....	SEN..	(b) Occurs in lower elevation desert scrub.....
<i>Thamnophis rufipunctatus</i> Narrow-headed garter snake.....	SEN..	(b) Documented in Blue River.....
AMPHIBIANS		
<i>Rana chiricahuensis</i> Chiricahua leopard frog.....	C/SEN..	(b) Inhabits backwaters/pools, Blue River.....
<i>Rana pipiens</i> Northern leopard frog.....	SEN..	(b) May occur in higher elevation streams/pools.....
<i>Rana yavapaiensis</i> Lowland leopard frog.....	SEN..	(b) Inhabits Blue River backwaters/pools.....

Species	USFWS and USFS Status	STATUS OF SPECIES/HABITAT IN ACTION AREA (AA) OF PROPOSED PROJECT	
		(a) Critical habitat present in AA	(b) Species or habitat present in AA
		(c) Neither species nor habitat in AA	
FISHES			
<i>Gila intermedia</i> gila chub.....	SEN..	(c) Species does not now inhabit river.....	
<i>Gila robusta</i> Roundtail chub.....	SEN..	(c) Species does not now inhabit river.....	
<i>Moxostoma valenciennesi</i> Spotted dace.....	SEN..	(c) Species does not now inhabit river.....	
<i>Rhinichthys osculatus</i> Speckled dace.....	SEN..	(b) Species inhabits Blue River/tributaries.....	
<i>Larrea tridentata</i> Larch minnow.....	SEN..	(b) Species inhabits Blue River.....	
<i>Xylocopa texensis</i> Resorback sucker.....	SEN..	(b) Introduced, non-breeding adults may persist.....	
No critical habitat designated on the Forest.....	SEN..	In Blue River	
INSECTS			
<i>Limnitis archippus</i> obsoleta	SEN..	(b) May inhabit cottonwood/willow habitats.....	
<i>Speyeria pokonius</i> nitrocris	SEN..	(b) May occur in wet meadows seasonally.....	
<i>Mountain silverspot</i> butterfly.....	SEN..	(b) May occur in wet meadows seasonally.....	
PLANTS			
<i>Allium gooddingii</i> Goodding onion.....	C/SEN..	(b) May occur in high elevation riparian/m-conifer	
<i>Echinocereus triglochidiatus</i> var. <i>arizonicus</i>	E/SEN..	(b) May occur in lower elevation pi/brush/rock.....	
Arizona hedgehog cactus.....	SEN..	(b) May occur along sandy/gravelly riverbanks.....	
<i>Eriogonum capillare</i> San Carlos Buckwheat.....	PE..	(c) No alkaline/saline springs.....	
<i>Puccinellia parishii</i> Parish alkali grass.....	C/SEN..	(b) May occur in forest riparian.....	
<i>Rumex orthocentrus</i> Blumer's dock.....	SEN..	(b) May occur in forest riparian.....	
<i>Senecio quercifolius</i> Gila groundsel.....	SEN..	(b) May occur in forest riparian.....	

Fire Management facilities to be avoided:

Escudilla Lookout	6N, 31E, NE Sec. 6	by .5 NM
Alpine Heliport	5N, 31E, WC Sec. 7	by .5 NM
Hannagan Heliport	3N, 29E, EC Sec. 3	by 3 NM or 1,500 AGL *
Blue Camp Heliport	3N, 31E, Sec. 15/22	by .5 NM
Bear Mt. Lookout	2N, R31E, NW Sec. 9	by .5 NM

* = Hannagan Heliport to be treated as an airport

Campgrounds to be avoided:

Luna Lake	5N, 31E, SW Sec. 9	by .5 NM
Upper Blue	4N, 32E, NE Sec. 18	by .5 NM
Blue Crossing	3N, 31E, SE Sec. 2	by .5 NM

TES species locations of critical concern:

Milligan Peak	4N, 31E, Sec. 1 & 12	by 1 NM
Castle Rock	4N, 30E, Sec. 26	by 1 NM
Red Hill	4N, 31E, Sec. 21	by 1 NM
Sawed Off Mtn.	3N, 30E, Sec. 29 & 30	by 1 NM
Bear Mtn.	2N, 31E, Sec. 3, 4, 5, 8, 9 & 10	by 1 NM
Luna Lake	5N, 31E, Sec. 8, 9, 16 & 17	by 1 NM

NOTE: Some areas are listed in more than one administrative category.
All radius avoidance distance recommendations are horizontal.
The wider radius of avoidance will take precedence in these cases.

Species	USFWS and USFS Status	District Species Status	Species Status in Action Area of Proposed Project		
			CH or PCH	Known to Occur	Not Documented but Habitat is Present
MAMMALS					
<u>Tadarida brasiliensis</u> Mexican free-tailed bat..	.SEN..	...S....YES - Dry forests, cliffs, foraging
<u>Zapus hudsonius luteus</u> New Mexican (meadow) jumping mouse.....	.SEN..	...S....YES - High elevation stream.....
BIRDS					
<u>Accipiter gentilis</u> Northern Goshawk.....	.SEN..	...S....YES - Nesting.....	
<u>Accipiter striatus</u> Sharp-shinned Hawk.....	.SEN..	...S....YES - Nesting.....	
<u>Botaurus lentiginosus</u> American Bittern.....	.SEN..	...S....YES - Nesting.....	.YES - Luna Lake.....
<u>Buteo albonotatus</u> Zone-tailed Hawk.....	.SEN..	...S....YES - Nesting.....	
<u>Buteogallus anthracinus</u> Common Black-hawk.....	.SEN..	...S....YES - Nesting.....	
<u>Buteo regalis</u> Ferruginous Hawk.....	.SEN..	...S....YES - Nesting.....	.YES - Grasslands, open country.....
<u>Buteo swainsoni</u> Swainson's Hawk.....	.SEN..	...S....YES - Wintering.....	
<u>Casmerodius albus</u> Great Egret.....	.SEN..	...S....YES.....	.Luna Lake.....
<u>Catharus fuscescens</u> Veery.....	.SEN..	...S?...YES - Nesting.....	.YES - Woody riparian.....
<u>Ceryle alcyon</u> Belted Kingfisher.....	.SEN..	...S....YES - Nesting.....	
<u>Charadrius montanus</u> Mountain Plover.....	.SEN..	...S?...YES.....	.YES - Open, flat, barren grasslands
<u>Dumetella carolinensis</u> Gray Catbird.....	.SEN..	...S....YES.....	.YES - Woody riparian.....
<u>Egretta thula</u> Snowy Egret.....	.SEN..	...S....YES.....	.Luna Lake & Blue River.....
<u>Epidonax traillii extimus</u> Southwestern Willow Flycatcher.....	E/SEN	...S....	.No.	...YES - Nesting.....	
<u>Falco mexicanus</u> Prairie Falcon.....	.SEN..	...S....YES - Nesting.....	
<u>Falco peregrinus anatum</u> American Peregrine Falcon.....	E/SEN	...S....	.No.	...YES - Nesting.....	
<u>Haliaeetus leucocephalus</u> Bald Eagle.....	T/SEN	...S....	.No.	...YES - Nesting and wintering.....	
<u>Himantopus mexicanus</u> Black-necked Stilt.....	.SEN..	...S?...YES.....	.Luna Lake.....
<u>Numenius americanus</u> Long-billed Curlew.....	.SEN..	...S?...YES.....	.Luna Lake.....
<u>Nycticorax nycticorax</u> Black-crowned Night Heron	.SEN..	...S....YES.....	.Luna Lake.....
<u>Otus flammeolus</u> Flammulated Owl.....	.SEN..	...S....YES.....	.Ponderosa Pine Forests.....
<u>Pandion haliaetus carolinensis</u> Osprey.....	.SEN..	...S....YES - Nesting.....	
<u>Pelecanus occidentalis</u> Brown Pelican.....	E/SEN	...S....	.No.	...YES.....	.Luna Lake transients.....
<u>Phalacrocorax auritus</u> Double-crested Cormorant.....	.SEN..	...S....YES - Nesting.....	

APACHE-SITGREAVES NATIONAL FORESTS

ALPINE RANGER DISTRICT

LIST OF

ENDANGERED, THREATENED, PROPOSED, CANDIDATE, AND SENSITIVE SPECIES

On 12/10/96 the U.S. Fish & Wildlife Service concurred that the listed, proposed, and sensitive species on this list may be present on the Alpine Ranger District. The Table below considers all of these species, and identifies which of them may be present in the action area of Visual Route 176 (USAF) based on known occurrence records or the availability of suitable habitat. Legend - Status: E = endangered, T = threatened, PE = proposed endangered, Sen = Forest Service Region 3 sensitive. S = Species occurs, S7 = Species may occur, CH or PCH = Critical Habitat or Proposed Critical Habitat.

Species	USFWS and USFS Status	District Species Status	Species Status in Action Area of Proposed Project		
			CH or PCH	Known to Occur	Not Documented but Habitat is Present
MAMMALS					
<u>Canis lupus baileyi</u> Mexican gray wolf.....	.E/SEN	...-....	.No.	.Extirpated..	.Re-introduction planned in 1998....
<u>Bassariscus astutus</u> Ringtail.....	.SEN..	...S....YES - Breeding.....
<u>Euderma maculatum</u> Spotted Bat.....	.SEN..	...S....YES.....	.Forests, cliffs, foraging.....
<u>Lutra canadensis sonora</u> Southwestern otter....	.SEN..	...S?..YES - Blue River.....
<u>Microtus montanus arizonensis</u>					
Arizona montane vole.....	.SEN..	...S....YES - High elevation forests.....
<u>Mustela nigripes</u> Black-footed ferret.....	.E/SEN	...S....	.No.No - No prairie dogs present.....
<u>Myotis lucifugus occultus</u>					
Occult little brown bat.....	.SEN..	...S....YES.....	.Forests, woodland, foraging.....
<u>Nasua nasua</u> Coati.....	.SEN..	...S?..YES - Breeding.....
<u>Notiosorex crawfordi</u> Desert shrew.....	.SEN..	...S?..YES - Arid woodlands.....
<u>Ovis canadensis nelsoni</u>					
Rocky Mountain bighorn sheep.....	.SEN..	...S....YES - Breeding.....
<u>Panthera onca</u> Jaguar.....	PE/SEN	...S....	.No.Transients from Mexico possible....
<u>Perognathus flavus goodpasteri</u>					
Silky pocket mouse.....	.SEN..	...S?..YES - juniper/desert grasslands....
<u>Plecotus townsendii pallescens</u>					
Pale Townsend's (Western) big-eared bat.....	.SEN..	...S?..YES - Caves, abandoned buildings...
<u>Sorex palustris navigator</u> Northern water shrew..	.SEN..	...S....YES - High elevation stream.....
<u>Spermophilus tridecemlineatus monticola</u>					
White Mountains ground squirrel.....	.SEN..	...S....YES.....	.High elevation grasslands.....

Species	USFWS and USFS Status	District Species Status	Species Status in Action Area of Proposed Project		
			CH or PCH	Known to Occur	Not Documented but Habitat is Present
INSECTS					
<u>Ameletus falsus</u> False ameletus mayfly.....	.SEN..	...S?...No - known	only from Little Colorado at Greer..
<u>Psephenus montanus</u> White Mountains water penny beetle.....	.SEN..	...S....YES - Cold, fast flowing streams...
<u>Speyeria nokomis nitocris</u> Mountain silverspot butterfly.....	.SEN..	...S?...YES - Seasonal wet meadows.....
PLANTS					
<u>Allium gooddingii</u> Goodding onion.....	.SEN..	...S....YES - Mesic forests.....
<u>Astragalus nutriosensis</u> Nutrioso milk vetch....	.SEN..	...S?...No - Mesa tops in Nutrioso.....
<u>Rumex orthoneurus</u> Blumer's dock.....	.SEN..	...S?...YES - Forest riparian.....
<u>Senecio quarens</u> Gila groundsel.....	.SEN..	...S....YES.....	.Forest riparian.....
<u>Talinum humile</u> Pinos Altos flame flower.....	.SEN..	...S?...YES - Gravely soils.....

Species	USFS and USFS Status	District Species Status	Species Status in Action Area of Proposed Project		
			CH or PCH	Known to Occur	Not Documented but Habitat is Present
BIRDS					
<u>Pinicola enucleator</u> Pine Grosbeak.....	.SEN..	..S....YES - Open conif. forest.....
<u>Plegadis chihi</u> White-faced Ibis.....	.SEN..	..S....YES.....	.Luna Lake.....
<u>Porzana carolina</u> Sora.....	.SEN..	..S?...YES - Lake, marsh.....
<u>Recurvirostra americana</u> American Avocet.....	.SEN..	..S....YES.....	.Luna Lake.....
<u>Setophaga ruticilla</u> American Redstart.....	.SEN..	..S?...YES - Woody riparian.....
<u>Strix occidentalis lucida</u> Mexican Spotted Owl..	.T/SEN	..S....	PCH.	...YES - Nesting.....
REPTILES					
<u>Thamnophis rufipunctatus</u> Narrowheaded garter snake.....	.SEN..	..S....YES.....	.Blue River.....
AMPHIBIANS					
<u>Rana chiricahuensis</u> Chiricahua leopard frog....	.SEN..	..S....YES - Ponds, tanks, Riparian.....
<u>Rana pipiens</u> Northern leopard frog.....	.SEN..	..S?...YES - Ponds, tanks, Riparian.....
FISHES					
<u>Gila robusta</u> Roundtail chub.....	.SEN..	..S....YES - San Francisco & Blue Rivers..
<u>Lepidomeda vittata</u> Little Colorado spinedace...	.T/SEN	..S....	.No.No - Not historic range.....
<u>Oncorhynchus apache</u> Apache trout.....	.T/SEN	..S....	.No.	...YES.....	.Blue River tributaries.....
<u>Pantosteus discobolus</u> Bluehead sucker.....	.SEN..	..S....No - Not historic range.....
<u>Rhinichthys osculus osculus</u> Speckled dace. Gila basin population.....	.SEN..	..S....YES - San Francisco River.....
<u>Rhinichthys osculus osculus</u> Speckled dace. Little Colorado basin population.....	.SEN..	..S....No - Not Historic range.....
<u>Tiaroga cobitus</u> Loach minnow.....	.T/SEN	..S....	PCH.	...YES.....	.Blue River.....
<u>Xyrauchen texanus</u> Razorback sucker No critical habitat designated on the Forests	.E/SEN	..S....	.No.	...YES.....	.Blue River.....

Species	USFWS and USFS Status	District Species Status	Species Status in Action Area of Proposed Project		
			CH or PCH	Known to Occur	Not Documented but Habitat is Present
FISHES					
<u>Pantosteus clarki</u> Desert (Gila mountain) sucker	..C2..	...S....YES - San Francisco River.....
CLAMS AND MUSSELS					
<u>Anodonta californiensis</u> California floater.....	..C2..	...S....YES - River, creeks.....
SNAILS					
<u>Discus shemeki cockerelli</u>					
Cockerell's striate disc snail.....	..C2..	...S7...Insufficient data to make determination.....	
<u>Fontelicella trivialis</u> Three Forks springsnail.	..C2..	...S....No - distribution restricted to Three Forks....	
PLANTS					
<u>Gentianella wislizeni</u> Wislizeni's gentianella..	..C2..	...S....YES - Shaded meadows, mixed conifer
<u>Trifolium longipes</u> var. <u>neurophyllum</u>					
White Mountains clover.....	..C2..	...S....YES - Wet meadows, ponderosa pine..

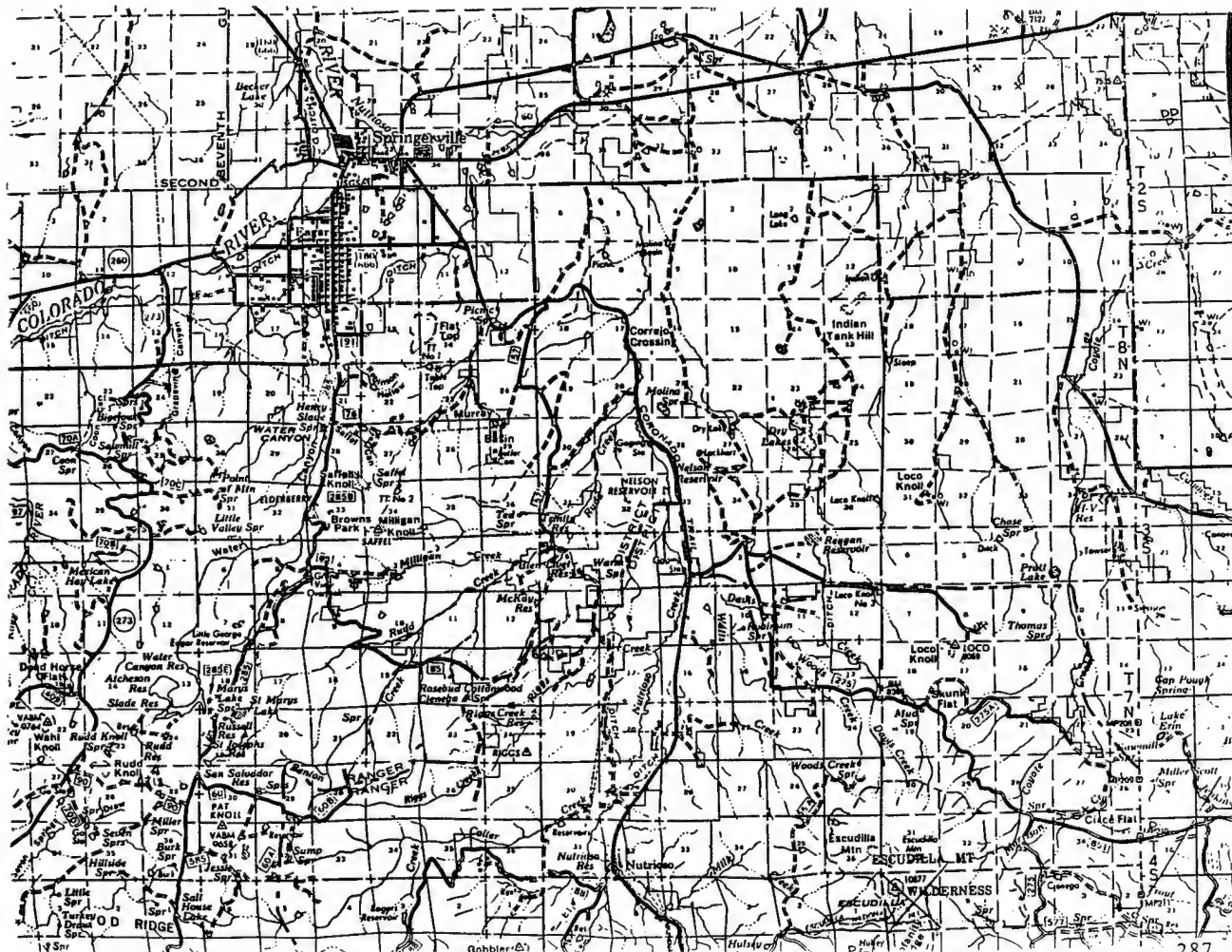
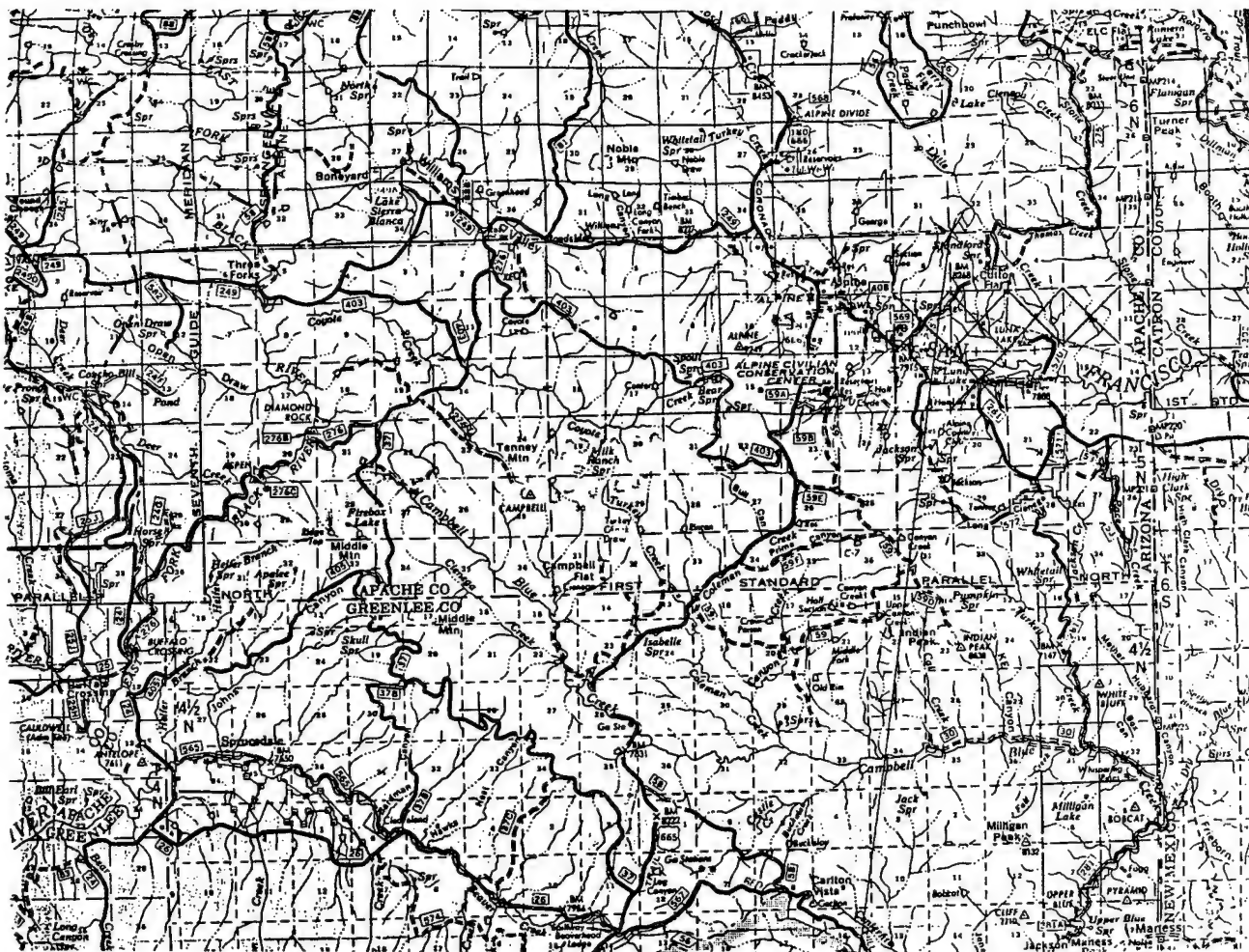
6

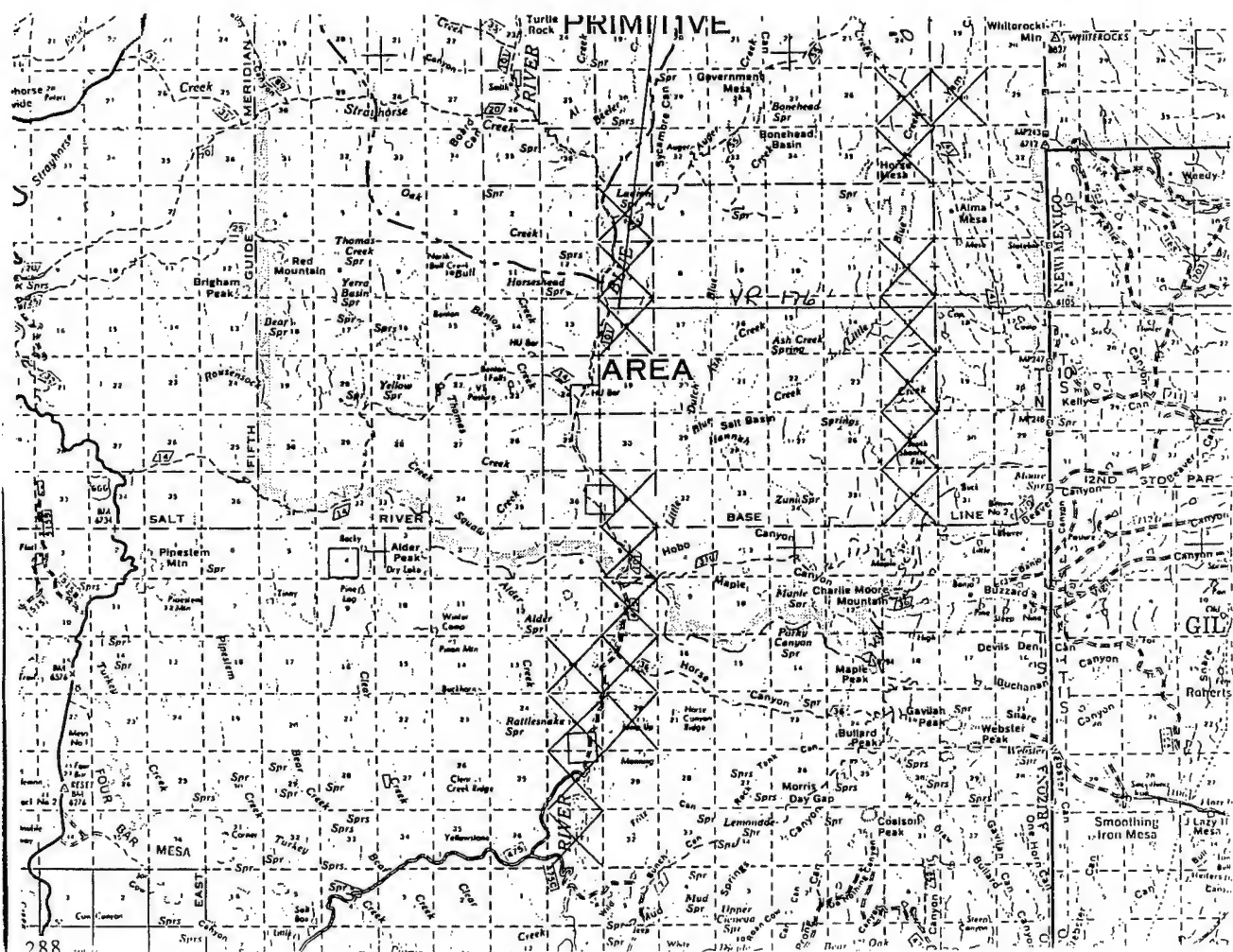
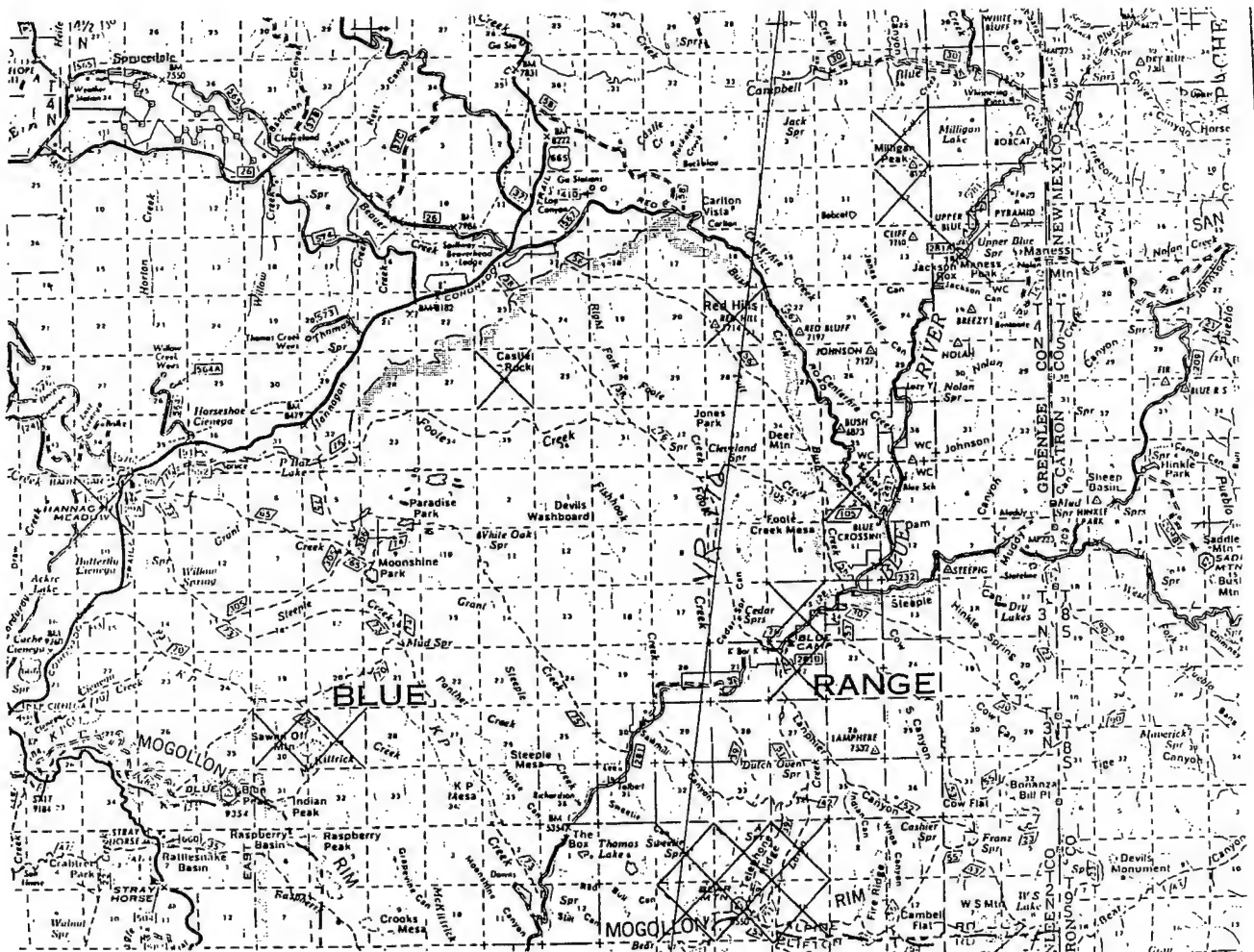
APACHE-SITGREAVES NATIONAL FORESTS
LIST OF
SPECIES OF CONCERN

These species were formerly designated as Category 2 candidates by the USFWS. None of them have been designated by the Regional Forester as sensitive species. There is no requirement to address these species in biological assessments and evaluations (FSM 2670.4). Change of status based on proposed rule published in the Fed. Reg. Vol 61(4): 7595-7613 (February 28, 1996).

Species	USFWS and USFS Status	District Species Status	Species Status in Action Area of Proposed Project		
			CH or PCH	Known to Occur	Not Documented but Habitat is Present
MAMMALS					
<u>Idionycteris phyllotis</u> Allen's (Mexican) big-eared (lappet-browed) bat.....	..C2..	...S....YES - Forests, cliffs, foraging....
<u>Myotis ciliolabrum</u> Small-footed myotis.....	..C2..	...S....YES - Caves, cliffs, foraging.....
<u>Myotis evotis</u> Long-eared myotis.....	..C2..	...S....YES - Coniferous forests, foraging.
<u>Myotis thysanodes</u> Fringed myotis.....	..C2..	...S....YES - Pine, woodland, riparian.....
<u>Myotis volans</u> Long-legged myotis.....	..C2..	...S....YES - Pine, woodland, riparian.....
<u>Nyctinomops (=Tadarida) macrotis</u>					
Big free-tailed bat.....	..C2..	...S?..YES - Ponderosa pine, scrub.....
BIRDS					
<u>Lanius ludovicianus</u> Loggerhead Shrike.....	..C2..	...S?..YES.....
AMPHIBIANS					
<u>Bufo microscaphus microscaphus</u>					
Arizona southwestern toad.....	..C2..	...S....YES - Blue River.....
FISHES					
<u>Agosia chrysogaster</u> Longfin dace.....	..C2..	...S....YES - Blue River.....
<u>Catostomus</u> sp. Little Colorado sucker.....	..C2..	...S....No - Not historic range.....
<u>Catostomus insignis</u> Sonora (Gila) sucker.....	..C2..	...S....No - Not historic range.....

5





**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street
Suite 102
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

Thank you for your presentation in Carrizozo on July 11. There seems to be very little environmental impact associated with the proposed expansion of the German Air Force at Holloman. The adverse effects on the human species should be the only concern. It seems that the government prefers to overlook us in any decisions they make.

As far as I'm concerned the Germans can go back to their own country and train there since that is the country they are supposed to defend. I would like to see all foreign troops back where they came from and our troops back here where they belong. I would also like to see us out of the UN and out of NATO and I would love to see Clinton back in Arkansas but then I'm just one of those right-wing paranoid, conspiratorial nuts. I even think this is a done deal no matter what the Air Force says. It would be interesting to see a tally on how many letters are received for and against this proposal. I guarantee the final decision will in no way reflect the will of the people.

Sincerely,
Becky Howard
Becky Howard

Becky A. Howard
Star Route 2 Box 49
Carrizozo, New Mexico 88301
Phone 505-648-2501 (Fax call ahead)
E-Mail Glen_W_Howard@JUNO.com
July 19, 1997

Thank you for your input.
PLEASE PRINT

DATE: _____

Dear Sir,
This is to let you know that
we totally support a Boeing range
for the air force. If there is anything
else we can do to help let us
know.

Thanks

JOHN D.

NAME: *JOHN D. (Showcase Carpets)*

ADDRESS: *800 New York*

CITY: *Alamogordo*

STATE/ZIP CODE: *7177 88310*

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA

ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7-21-97

Please accept this letter as my show of support for the planned expansion of the German Air Force Training at Holloman Air Force Base, better known as Hannon II, and the development of a national training target complex at the McGregor Range. The German Air Force and their family members, in addition to contributing to our nation's defense, are also contributing to the economy of the state of New Mexico. The German Air Force has contributed much to our community recently as well.

I further support Holloman Air Force Base and strongly support all efforts on their part to obtain their new range. What better place could there be other than McGregor Range, with the continued withdrawal of B-1B land on McGregor Range for another extended period of time, if not permanently, it would tend greatly to the development of new resources such as the Tactical Target Complex and allow our Air Force to remain committed to providing the necessary training for our fleet.

Holloman AFB is the economic engine that drives the economies of Alamogordo and Otero County. I shudder to think what would happen if something were to happen to her. We have an opportunity being presented to us that may never happen again as (grand as it is) we need to take advantage of this and show once again, as it has since the early 1900s, that Alamogordo and the State of New Mexico supports the needs of Otero County and the State of New Mexico.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Miles LeBeyec
ADDRESS: P.O. Box 837
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88310

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Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 7/21/97

Let alone IS the sound
of Reagan!!!
We need the Range.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Mike Hess
ADDRESS: 1505 Granada
CITY: Alamogordo N.M.
STATE/ZIP CODE: 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

No need to
No need to

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/21/97

I support adding German
weapons.

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/21/97

I have space to show a number of the German
Air Force Reserve Station at Holloman AFB. I want
them to be a better addition to the area. Please
keep my remarks as a strong affirmative vote in
favor of their continued presence and further
and strongly that the impact of the presence of a
large military not cause unnecessary harm to the
surrounding area.

[Signature]

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: T L M FAVORITE (M.D.)
ADDRESS: 1401 LOCUST
CITY: ALAMOGORDO
STATE/ZIP CODE: NM 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: John R. Barber
ADDRESS: 1111 1st St
CITY: Alamogordo
STATE/ZIP CODE: NM 88311

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AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-21-97

Let's think this would be a very good thing for our community. We have already cut down on our mail by other ways to much. We know about

Thank for the opportunity to comment

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Bennett Patrick Jones
ADDRESS: P.O. Drawer BB
CITY: Alamogordo
STATE/ZIP CODE: N.M. 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCICEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/21/97

TO WHOM IT MAY CONCERN:

I AM IN FAVOR OF THE ADDITIONAL BOMBING RANGE TO SUPPORT THE GERMAN & AMERICAN TRAINING AT HELLMAN AFB. THIS PROJECT IS NEEDED FOR TRAINING OUR PILOTS AND TO INSURE DIFFERENT TERRAIN FOLLOWING ROUTES FOR TRAINING. I TRULY BELIEVE THAT BLM HAS A TOTALLY DIFFERENT AGENDA THAT THEY ARE COVERING UP. HAVING DEALT WITH BLM & HEARD SOME OF THEIR RESENTMENT OF DEPT OF DEFENSE, I BELIEVE THEY ARE TRYING TO RECLAIM M. GREGOR RANGE FOR THEIR OWN BENEFITS. THE CONTINUED USE OF M. GREGOR RANGE FOR TRAINING ALL OF OUR MILITARY IS OF PRIME IMPORTANCE TO THE SECURITY OF OUR NATION. IF BLM IS ALLOWED TO GET THE MILITARY OFF M. GREGOR, A PRECEDENT WILL BE SET AND ALL MILITARY RANGES WILL BE AT RISK. THIS IS NOT ACCEPTABLE FOR THE SECURITY OF THE USA. AS LONG AS THE FLIGHT PATHS DO NOT INCLUDE HOMES, CORRALS, OR OCCUR DURING BRANDING OR SHOOTING, I BELIEVE A JOINT-USE LAND USE IS VERY

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: MALCOLM M. RAMEY
ADDRESS: 222 S. WHITE SANDS
CITY: ALAMOGORDO
STATE/ZIP CODE: N.M. 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. [X]

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCICEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-21-97

As a retired military aviator and spouse the majority of his flying career in the low level environment I take exception to comments expressed by local area (Dona County) environmentalists who speak of a threat to opposition to expansion of the General Training program at Holloman AFB. The majority of the comment that I have not witnessed, dated on incorrect assumptions and shows a close lack of understanding of low level training. Spots can be removed, activities can be adjusted to minimize early issues. Humans adjust to the sound of aircraft and are not adversely affected by noise any more than people who live on the approach path to a major airport as in pecking away at the low level training area along US of the approach to the field.

The fear of the noise is a total fiction, however, if Dona County does not approve General Training and does not with- draw of the General Training area, I strongly support the plan for expansion for Dona County and US military use. Government of that program and noise will be much to reduce the noise of the General AFB. It will also be much to reduce the noise of the General AFB. It will also be much to reduce the noise of the General AFB. It will also be much to reduce the noise of the General AFB.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: James F. Davis (On USAF Ret.)
ADDRESS: 5015 La Brea St
CITY: Tempe, AZ
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []
Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7/21/97

Holloman AFB is a good neighbor. The USAF has given itself to be a good steward of the land. The relationship between Holloman and the surrounding communities, especially Alamogordo, has been continuous to be excellent. Alamogordo is very dependent upon the spending of the military in its members. Many of the local citizens including myself, come to Alamogordo as members of the USAF. I decided to stay after their service was completed.

The expansion of operations at Holloman will not in my opinion, adversely affect local residents, hikers and campers. Our vast land area can comfortably accommodate all interests. The USAF has done an excellent job of addressing the problem areas.

The National Defense is of utmost importance. And the resources of our area need to be used. In today's military training is more important than ever because of the reduction in forces. Our area offers one of the best locations in the world for training.

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Tim Harris
ADDRESS: Box 797
CITY: Alamogordo
STATE/ZIP CODE: NM 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []
Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

July 21, 1997

Alamogordo Daily News
P.O. Box 870
Alamogordo, NM 88311-0870
Attn: Richard Coltharp, Editor

Dear Richard:

Please accept this as a Letter to the Editor of the Alamogordo Daily News.

A tremendous amount of effort on the part of many people has been expended both for and against the planned new bombing facility on McGregor Range. The proponents want to see the addition of expanded German Air Force activity at Holloman Air Force Base. Many of those opposing the location of the bombing range do so because of unknown economic damage to the ranching activities beneath the flight path of aircraft engaged in that activity.

The Sunday, July 13, 1997 edition of the Alamogordo Daily News stated that the preferred McGregor Range Otero Mesa site would cost \$4 million. The next best site located west of Otero Mesa would cost \$20 million. With the savings of \$16 million by using the Otero Mesa site for the bombing range, adequate "savings" exist for this decision to also be Constitutionally correct.

The ownership of real estate includes many separate rights, including the right to use the property (for legal purposes) free from interference or disturbance, "the right to quiet enjoyment." Tenants leasing land also have the right to quiet enjoyment for the purpose for which the property was leased: in this case grazing.

America's Constitution gives the government the right of eminent domain, the right to take private property rights for public interest with Just Compensation to the deprived property owners. Yet, to my knowledge, one specific aspect of compliance with the Constitution has not been publicly discussed: Just Compensation.

Is the Air Force trying to sidestep the responsibility for compensation to property owners losing a portion of their property rights to this activity? Will this become another example of our government requiring its citizens to abide by the Constitution but failing to do so itself?

500 Tenth Street, Suite One • P. O. Box 1705, Alamogordo, NM 88311-1705
(505) 437-0220 • Fax (505) 437-0042

Page 2
July 21, 1997

This issue is not complicated. The government has the right to condemn private property rights. Some ranchers' property rights will be diminished as a consequence of this project, if located on the Otero Mesa. Representatives from the Air Force and the ranching interests should meet and negotiate an agreement recognizing that there may be damage to private property rights and agreeing to allow adequate time, several years, to observe, evaluate and quantify that damage. Thereafter the parties will meet to discuss compensation. If compensation can not be agreed out of court, the case will be taken to court and a court will decide the value of the damage done to the ranchers' property rights. The Air Force would pay that damage and the issue would be settled. This procedure will allow the ranchers impacted by a bombing range on Otero Mesa to be properly compensated, while allowing the project to move forward now, at the site the Air Force prefers.

This is a simple problem. Our Constitution provides a mechanism to solve it. A request of our United States Air Force: please abide by our American Constitution and handle this issue accordingly.

Michael D. Shyne

Michael Shyne

MS:rc

Fetlinger, Bloom & Quinlan, P.C.

ATTORNEYS AT LAW
FIRST NATIONAL BANK BUILDING
POST OFFICE DRAWER M
ALAMOGORDO, NEW MEXICO
88311-7221

Phone: 505-437-6520
FAX: 505-437-6529

July 22, 1997

Air Combat Command Environmental Analysis Branch

HQ ACC/CEVA

ATT: Ms. Sheryl Parker

Langley Air Force Base, Virginia 23665-2769

Dear Ms. Parker:

The purpose of this letter is to support the planned expansion of the German Air Force training operations at Holloman Air Force Base (GAF II).

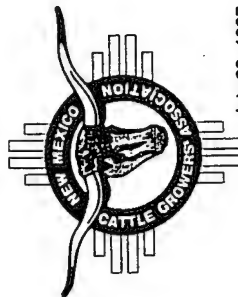
Any such expansion would have little, if any, negative impact on the environment or the lives of the people living in this area. This is an appropriate utilization of the territory.

Alamogordo and the surrounding communities in the Tularosa Basin, as well as the whole state of New Mexico, have long been supportive of military operations. I can think of no better place than Holloman Air Force Base for the expansion of the German Air Force training operations.

Very truly yours,

Gregory M. Quinlan
Gregory M. Quinlan

GMQ:ep



New Mexico Cattle Growers' Association

2231 RIO GRANDE BLVD., N.W. • BOX 7517
TELEPHONE (505) 247-0584
ALBUQUERQUE, NEW MEXICO 87104

July 22, 1997

Ms. Sheryl Parker

HQ ACC/CEVA

129 Andrews Street, Suite 102

Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

RE: Proposed Expansion of German
Air Force operations at
Holloman Air Force Base

BILL HUMPHRIES
PRESIDENT
LINCOLN, NM
AL SCHNEIDER
EXECUTIVE DIRECTOR
ALBUQUERQUE, NM

BOB FROST
FIRST VICE PRESIDENT
SAN JON, NM
JIMMY R. BASON
VICE PRESIDENT
HILLSBORO, NM
STELLA MONTANA
VICE PRESIDENT
LA PLATA, NM
CARL LANE JOHNSON
VICE PRESIDENT
TATUM, NM

Thank you for the opportunity to comment on the above noted issue. Increased flights of German air craft have the potential to affect virtually every aspect of our daily lives from the health, welfare and personal safety of our families to the economic value of our livestock and property to the wildlife so abundant in our environment. We were first told that the fighters would be flying at an elevation of 100 feet every 40 minutes around the clock. We now have been told that they will be flying at 500 feet six to eight times per day. Obviously, the impacts of the two plans would be different, as well as it would be for some variation between the two. Here are a few questions we would like to have answered:

IMPACT ON ANIMALS

What will be the impact on the reproductive capacity of animals, both domestic and wild, within the flight paths for the German bombers? How will any loss of reproductivity in both domestic animals and wildlife be compensated for and who will pay that compensation? What will be the economic impact of the loss of reproductivity on rural communities who will suffer if stockmen produce less livestock and wildlife reductions create loss of hunters?

IMPACT ON HUMANS

It seems that low flying aircraft pose extreme danger to anyone conducting outdoor activities from children playing to sportsmen to caretakers of the land. What are the impacts of the continuous noise of aircraft on these individuals? Does stress impact future reproductivity of these people as well as animals? How many air crashes can be anticipated with this volume of air traffic?

IMPACT ON PROPERTY

Air craft noise will undoubtedly lead to the destruction of property when frightened animals are forced through fences or pens. At the same time, animals can cause bodily harm to themselves. What compensation is planned for such occurrences? What is the potential for loss in property values in terms of agricultural, recreational or aesthetic value?

Page 2
Ms. Sheryl Parker
July 22, 1997

There are numerous other points that could be mentioned, but these questions provide a start to taking a deep look into the implications of proposed expansion. Thank you in advance for your time and consideration. I look forward to receiving your answers.

Sincerely,



Bill Humphries
President

Caren Cowan
P.O. Box 7517
Albuquerque, New Mexico 87104
505/247-0584

July 22, 1997

Ms. Sheryl Parker
HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, VA 23665-2769

RE: Proposed Expansion of German
Air Force operations at
Holloman Air Force Base

Dear Ms. Parker:

Thank you for the opportunity to comment on the above noted issue. Increased flights of German air craft have the potential to affect virtually every aspect of our daily lives from the health, welfare and personal safety of our families to the economic value of our livestock and property to the wildlife so abundant in our environment. We were first told that the fighters would be flying at an elevation of 100 feet every 40 minutes around the clock. We now have been told that they will be flying at 500 feet six to eight times per day. Obviously, the impacts of the two plans would be different, as well as it would be for some variation between the two. Here are a few questions we would like to have answered:

WJ-300

IMPACT ON ANIMALS

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IMPACT ON PROPERTY

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There are numerous other points that could be mentioned, but these questions provide a start to taking a deep look into the implications of proposed expansion. Thank you in advance for your time and consideration. I look forward to receiving your answers.

Sincerely,



Caren Cowan

Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

DATE: 7-22-97

Please read all information carefully.

There are blue peaceful skies here in Otero County. I would like to see them remain that way. I don't believe we need more planes disturbing that peace.

As far as economic impact, business owners are more concerned with lining their own pockets without concern towards issues such as the peacefulness of this area, small town charm, low crime rates, or the limited water supply we have here in Otero County. The business owners don't take many simple pleasures into consideration, for many of them the bottom line is the dollar.

I am a native of Otero County. I am close to 40 years old. I would like to see this way of life continue. Many people ask how long I have been in the area and are genuinely surprised when I tell them I am a native as they have not ever met anyone else who is a native. That's a damn shame.

Water. That's a subject that's been beat to death. It's a precious resource but too many people who are not from the desert think it is something to be taken for granted, an unlimited supply. HA. A man from Colorado came in recently and went on and on about how beautiful the area was and what a pity it was we didn't have enough water. This man continued to state over and over, there had to be a solution. He acted as though we were trying to keep something from him. (I wanted to suggest he have a little talk with God to see if there wasn't something he could do for this little man but short of that management would help better control what little supply we do have.)

Noise pollution is a crying shame. I read a recent letter to the editor regarding a man who stated the low flying military aircraft doesn't bother many of the business people here in Alamogordo but that is because they aren't flying low flights over Alamogordo. He went on to say, if that were to happen, they wouldn't be so willing to have more missions and would be busy throwing fits. Of course, it doesn't have a negative impact on their businesses or their way of life, it only has a positive effect without changing their quality of life. On the other hand, the rural guy who has a significant investment in livestock if another matter.

How often to you think those business people eat meat? Once a day, twice? Where is it coming from? The livestock people. The same people who are having a rough time making ends meet.

Private land is also a scare commodity here in New Mexico. Between the federal government and the state government, there isn't a large percentage of land here in New Mexico privately owned. The GAF has caused the price of renting and owning property including houses to be out of reach of the "common" person. If you are not GAF or a business owner, your chances of owning in Otero County are getting slimmer and slimmer.

The letter accompanying the form I received from the Chamber of Commerce states, "please do not delay in sending your positive comments". I hope the environmental impact statement covers more than what concerns the business people of Alamogordo.

I believe in give and take. I believe we have given enough. At stake is our rural community and it's way of life. Don't let pure greed take everything we have.

Respectfully,

Native of Otero County



CHAMBER OF COMMERCE

(505) 437-6120 • Fax (505) 437-6334 • E-Mail chamber@wazoo.com
1301 N. White Sands Blvd. • Box 518, Alamogordo, New Mexico U.S.A. 88311-0518

July 14, 1997

Dear Chamber Member,

The Air Force has conducted a series of meetings around Southern New Mexico and West Texas to get public input on the impact of the Air Force having their own bombing range. The range would also allow for an expanded 30 German Tornado aircraft and 640 personnel to be assigned to Holloman.

Your comments in support of this project are essential to the study. If you believe that a strong military defense and continued support of our neighbors at Holloman AFB is important, please put your comments on the attached form. Time is of the essence since comments have to be in to the Air Force by August 4, 1997. Please do not delay in sending your positive comments. All you have to really say is that you support this. You know the impact.

Sincerely,

Toots Green

Toots Green
President

TG/hp

enclosure

"TAKING CARE OF BUSINESS"

Draft Environmental Impact Statement Expansion of German Air Force Operations at Holloman Air Force Base, New Mexico

WRITTEN COMMENT SHEET

Thank you for your input.

PLEASE PRINT

DATE: 07/22/97

TO: Air Combat Command Environmental Analysis Branch

My wife and I would like to express our strong support for the thickness of the planned expansion of a dedicated bombing range which includes the continued withdrawal of the 30 German Tornado aircraft to include all of our portion of the base land as well as public land currently being managed (?) by BLM within Pecos County.

We also fully support the planned expansion of the German Air Force Training Operations (Holloman II). The past and current military operations at all our military branches (and now to include the German Air Force Training Operations) have been and continue to be a vital part of our National Defense as a whole.

It is one of our desires to have current as well as future operations within Pecos County. Please feel free to call or let us help. Maurice McDonald, 4500 E. 1st St. (505-439-1212)

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Maurice & Gisela McDonald
ADDRESS: 3009 Dill St.
CITY: Albuquerque
STATE/ZIP CODE: NM 88310-3914
Gisela McDonald

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:
AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA

ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

**Mission and Master Plan
Programmatic Environmental Impact Statement
Fort Bliss, Texas and New Mexico**

Thank you for your input

PLEASE PRINT

To whom it may concern,

DATE: 7/23/97

Which comes to the subject of the Germans

Wanting more land for a bombing range, I would like
them to use the Red Rio i Oscura, (The No Action
Alternative Plan.) Which is already being use by the

German Air Force for live munitions, why can't they
use this for low level-ground radar runs? With future
missions how much more land will it take?

If there is a accident on the Otero Mesa, where
I reside, resulting in damage to private property or
loss of life human or animals who will be responsible
for compensation. (The German Air Force?) I am against
taking any new land for the bombing range.

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: ELMER C. AKERS
ADDRESS: P.O. Box 1095
CITY: Alamogordo, New Mexico
STATE/ZIP CODE: New Mexico 88311-1095

Please check if you would like to receive a copy of the Draft Environmental Impact Statement. | |

Please Hand This Form In, or Mail To:

MR. KEITH LANDRETH, CHIEF CULTURAL/NATURAL RESOURCE DIVISION
DIRECTORATE OF ENVIRONMENT
U.S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS
ATTN: ATZC-DOE-C (PEIS COMMENT)
FORT BLISS, TEXAS 79916

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input

PLEASE PRINT

DATE: 7/23/97

I fully support the establishment of
the Holloman AFB dedicated bombing
range.

As a businessman, a farmer, a
long-time resident of Otero County,
I am fully cognizant of:

1) The absolute need to provide for
the needs of Holloman AFB now
if we are to maintain the economic
contributions of Holloman AFB to
our community.

2) The "Bombing Range" forwards our
military defense strategic needs

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Thommas M. McConar
ADDRESS: 320 W. Hwy 54-10
CITY: Alamogordo
STATE/ZIP CODE: New Mexico 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement. | |

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Written Comment Sheet

July 23, 1997

Air Combat Command Environmental Analysis Branch
 HQ ACC/CEVA
 Attn: Ms. Sheryl Parker
 Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

My husband and I have been residents of Alamogordo since 1973. My father was in the Air Force and was stationed at Holloman Air Force Base; my entire family fell in love with this area and all of us still live in Alamogordo.

With a strong military background as well as the continued hope of pursuing our careers here, I strongly support the planned expansion of the German Air Force training operations as well as developing a dedicated bombing range to support their training. It is important to continue the withdrawal of McGregor Range lands to achieve this goal.

Holloman Air Force Base and White Sands Missile Range provide the economic backbone of our county; it would be disastrous to us if another "Roswell" incident were to be allowed to happen here by not supporting our commitment to Holloman Air Force Base and the continued training and support to the German Air Force.

I strongly resent the BLM lobbying against this projectthey do not contribute nor even work or live in our town yet they are considered the experts at what is best for Alamogordo. With all the closures of military bases that we have seen in the past several years, we must assure Otero County the continued existence of Holloman Air Force Base and its contributions to our area.

Sincerely,



Liz Foster
 P.O. Box 1427
 Alamogordo, NM 88311-1427

Mission and Master Plan
 Programmatic Environmental Impact Statement
 Fort Bliss, Texas and New Mexico

Thank you for your input

PLEASE PRINT

DATE: 7-23-97

to whom IT May Concerns:

On the subject of expanding the missile range, I do not believe it is necessary. Since there is enough land for the purpose needed, if only the government would clean up the area which should be cleaned. I believe that the ranchers etc. have a right of peaceful enjoyment on their own personal land & the government should NOT take their land for more tests. Just clean up what they now own. There is room for everyone in New Mexico.

W-304

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: Dixie T. Babcock
 ADDRESS: 3133 Del Sur
 CITY: Alamogordo
 STATE/ZIP/CODE: New Mexico 88310

Please check if you would like to receive a copy of the Draft Environmental Impact Statement. []

Please Hand This Form In, or Mail To:

MR. KEITH LANDRETH, CHIEF CULTURAL/NATURAL RESOURCE DIVISION
 DIRECTORATE OF ENVIRONMENT
 U.S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS
 ATTN: ATZC-DOEC (PEIS COMMENT)
 FORT BLISS, TEXAS 79916

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

Thank you for your input.
PLEASE PRINT

DATE: 7-23-97

I favor the present, and expanded training of German Air Force Personnel at Holloman AFB. I also support the development of a dedicated Bombing Range for Holloman AFB Training Operations.

I appreciate the opportunity to offer these comments!

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: Manuel Gonzales
ADDRESS: P.O. Box 1728
CITY: Alamogordo
STATE/ZIP CODE: NM 88310

Please check if you would like to receive a copy of the Final Environmental Impact Statement, ☒

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACC/CEVA
ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

7-23-97

I FULLY SUPPORT THAT THE AIR FORCE HAVE THEIR OWN BOMBING RANGE

ALAMOGORDO LIVES IN THE AREA OF KNOW ~~BE~~ THE IMPORTANCE OF THE ECONOMIC CONTRIBUTIONS FROM HOLLAMAN AFB THE COMMUNITY NEEDS TO WORK & SUPPORT THEM.

DREENA M. MCGINN
7320 U.S. HWY 54/70
ALAMOGORDO NM 88310

**Draft Environmental Impact Statement
Expansion of German Air Force Operations at
Holloman Air Force Base, New Mexico**

WRITTEN COMMENT SHEET

DATE: 1 28 1997

Thank you for your input.

PLEASE PRINT

G.choes my sentiments, exactly

It's of life and land

The following comments about the current controversy over the German Air Force training program proposed for Holloman Air Force Base are based on knowledge gained throughout many meetings in our area and west Texas. They represent my opinion only, but are also reflected by many of my friends and neighbors.

I am a native Alamogordo. I was born and attended public schools in our fair city. Many longtime friends reside here. I have no desire to cause problems for anyone living here and depending on the government dollars spent by the military. I have often thought and heard other successful individuals say that Alamogordo should spend a lot more time trying to diversify its economy for that inevitable day when the air base closes. Those of us who are rural residents and who are mostly descended from pioneer families who settled here when life was not easy, filled with hardship, danger and privation should be entitled to some respect. It seems when the situation improved, outsiders descended on us with plans for the mapping the future without our input.

Be that as it may, we have had to sacrifice homes, businesses, loved ones, and our children's future prospects for the military. Before now, the war effort in the second World War and national security measures combined with patriotism was expected of us in the Korean War, Vietnam, and throughout most of this period, the Cold War with the Soviet Union. We have done more than our share, losing many family members toward this end. Over 50 years of our existence have been impacted negatively in this fashion.

We have tried to negotiate for a more acceptable solution than that proposed by the U.S. Air Force but

have been exposed to half-truths, changed agenda and have been stone walled in some cases. A lack of consistency in specific informational presentations by the Air Force group at different locations in New Mexico and Texas has caused a decided lack of trust when combined with the intractable positions of Chamber of Commerce individuals. Surely some compassion should be shown for those who do not stand to benefit from these activities, and never have for nearly 60 years. Combined, the populations of all the communities and individuals in N.M. and west Texas who will suffer from the proposed actions without any hope of redress probably will outnumber the beneficiaries. This would be caused by the prostitution of our technology and military expertise for foreign dollars by the Air Force.

Of the 400,000 acres of private land on Otero Mesa, 100,000 acres of it is in the area to be hammered by foreign pilots whose people were involved in two horrible wars in the role of our antagonists.

Our lives as ranchers and rural residents will be totally intolerable if this proposal goes into effect.

One of the finest grazing land areas in New Mexico is on Otero Mesa which serves the multiple uses of recreation, hunting and cattle forage to name a few. A friend of mine who was involved in security on McGregor Range for several years told me of the desire of the army to be able to use this area for maneuvers with tracked vehicles and live ordnance which would discontinue the multiple use aspects outlined in the withdrawal approved by Congress. Some of us had hoped to have this area returned to the Grazing District of BLM to resolve the longtime animosity generated by the dual management provisions. The potential closing of state road 606 for five days a week, Monday through

*** CONTINUE ON BACK FOR MORE SPACE ***

NAME: R. K. Paul

ADDRESS: 3100 Crescent

CITY: Alamogordo NM 88311

STATE/ZIP CODE: Alamogordo NM 88311

Please check if you would like to receive a copy of the Final Environmental Impact Statement. []

Please Hand This Form In or Mail To:

AIR COMBAT COMMAND ENVIRONMENTAL ANALYSIS BRANCH
HQ ACCCEVA

ATTN: MS. SHERYL PARKER
LANGLEY AIR FORCE BASE, VA 23665-2769

Friday up until 11 p.m. because it crosses the range and would be in the area designated for testing, would deny us access to the road and make it virtually impossible to conduct business and lead a normal life.

Many thousand acres of New Mexico State land are also at risk. If the proposed action takes place, the beneficiary of the trust, our public schools and colleges will lose their revenue because the land will be worthless and uninhabitable.

There are many other groups of people with different but heartfelt problems with United States Air Force proposal. There are serious divisions in our country over the role of government and the attacks on the United States Constitution and they are not all paranoid radicals.

Please listen to our concerns and adopt the alternative the EIS Document of no action and train Germans on land and air already totally controlled by the military. I understand they won't leave as they have been evicted from every where else including their own country.

Please throw out the low level flights over the prime areas of N.M. and West Texas.

I feel that if roles were reversed and the overflights were taking place over Alamogordo, which is the only community to benefit from this action, they would never happen and further I believe that my rural constituents would not expect it to happen.

Bob Jones and his family have owned much land in southern Otero County for more than 100 years.

LADDER RANCH
HC Box 95
Caballo, NM 87831
505-895-3360
Fax 505-895-3361

July 28, 1997

Ms. Sheryl Parker
HQ ACC - CEVA 129
Andrews Street, Suite 102
Langley Air Force Base
Virginia 23665

Dear Ms. Parker:

Thank you the opportunity to comment on the Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico - Draft Environmental Impact Statement.

Unfortunately, we have not had adequate time to review this document fully. However, due to the impending deadline for comments less than a week away, we are responding to you with our immediate concerns with these proposed operations.

Background:

The Ladder Ranch is owned by Turner Enterprises Inc. and is one of three Turner ranches in New Mexico. These properties are managed for bison production and wildlife diversity. The Ladder Ranch is unique in many ways and because of its live streams and diverse desert grassland/riparian habitats, it contributes significantly to the biodiversity of the Southwest.

Turner Enterprises Inc. has made a strong commitment to protecting and managing the environments within these properties which is reflected in the development of the Turner Endangered Species Fund. This new division was created to coordinate the management of endangered species on 1.5 million acres of Turner properties including the Ladder Ranch.

The Ladder Ranch is located west of Truth or Consequences, roughly between Winston on the north and Hillsboro on the south (see map). It consists of 154,000 acres of private land, 20,000 acres of state land, 9,000 acres of BLM land, 73,000 acres of Forest Allotments totalling 256,000 acres within Sierra County.

Concerns:

Low level jet flights over the Ladder Ranch could adversely effect the following species of wildlife and livestock:

1. Bald Eagle (Threatened) The Ladder supports the only reproducing pair of Southern Bald Eagles in New Mexico.
2. Peregrine Falcon (Endangered) Several nesting pairs are located within the Ladder Allotments and forage on the ranch.

3. Mexican Wolf (Endangered) In cooperation with the USFWS the ranch will hold wolves scheduled for release in the wild in 1998.
4. California Condors (Endangered) The Ladder is scheduled for condor releases in 1999.
5. Bison (Livestock) The Ladder manages a commercial herd of 1100 bison.

WJ-305

WJ-306

We feel that consideration for the above species needs to be addressed in your planning process and we would like the opportunity to work with the Air Force to help identify and mitigate potential impacts of low altitude flights over Turner properties.

Airspace safety and restrictions may conflict with the following ranch operations:

1. Annual low level wildlife surveys.
2. Ranch security patrols.
3. Turner administrators, guests and VIPs that frequent the ranch by air.

WJ-307

VR 176 is routed directly over the Ladder Ranch headquarters. Safe airspace over our ranch operations is of paramount concern.

WJ-308

We respectfully request an extended comment period that would help us address these and other concerns relevant to this proposal. We would, also, gladly meet with the appropriate persons to discuss our concerns.

Thank you for your consideration.

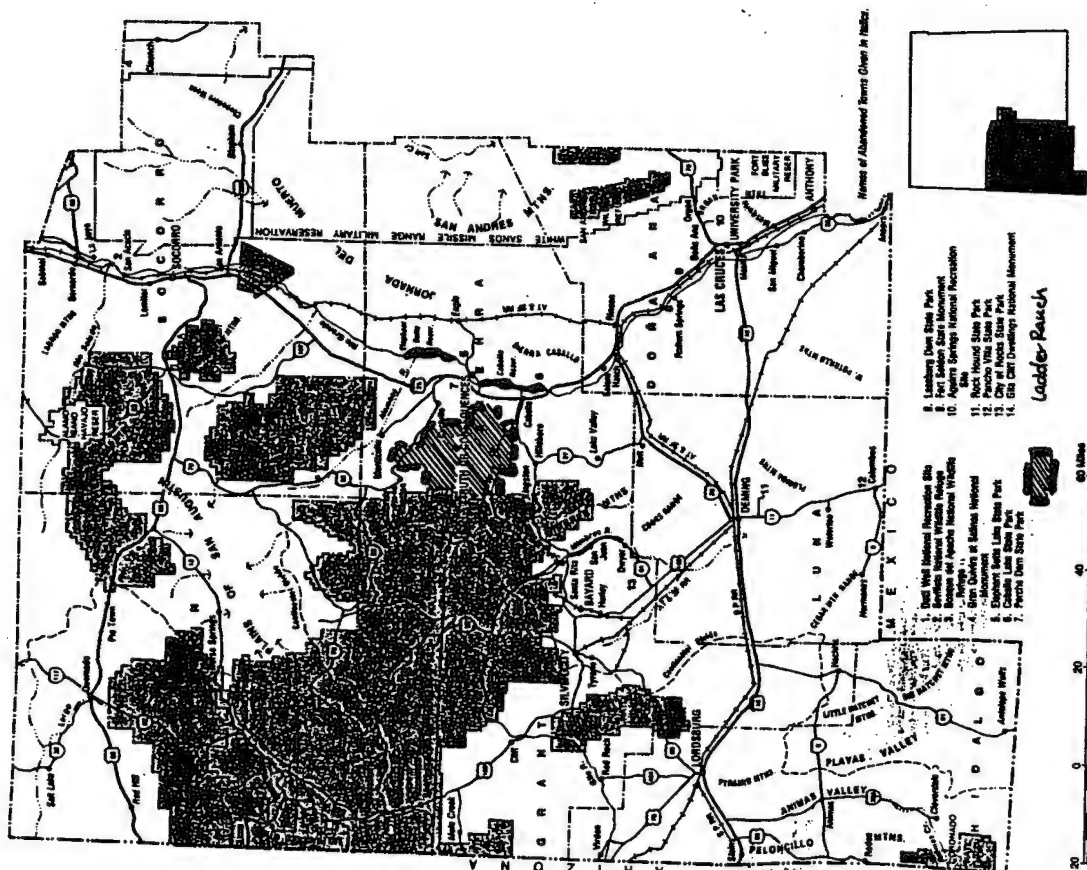
Sincerely,



Steve J. Dobrott
Manager
Ladder Ranch
(505-895-3360)

cc: Russ Miller, General Manager, Turner Enterprises Inc.
Mike Phillips, Executive Director, Turner Endangered Species Fund

WJ-305



July 26, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
1219 Andrews Street
Langley AFB, Virginia 23665-2769

Certified Mail
No. P 074 620 661

Reference: Proposed Airspace Modifications To Support Units At
Holloman Air Force Base, New Mexico
Draft, Environmental Impact Statement, June, 1996
Final Environmental Assessment, June 9, 1997

Subject : Complaint that USAF Public Hearings and the resultant actions
are UNFAIR.

We consider the presentation of this Environmental Assessment (EA) as UNFAIR due to the lack of documentation, communication or verbal instruction as to the procedures required, and to the misleading content of the title used for this proposal. For all practical purposes, there was no public notice issued to the citizens of the Trans-Pecos Area (Trans-Pecos Area is the area of Texas north of the Rio Grande River, west of the Pecos River and south of the Texas/New Mexico border). Ordinary citizens not intimately acquainted with such proceedings do not know who to, or where to turn for counsel. The very wording of the title is misleading. Reading this "Proposed Airspace Modifications To Support Units At Holloman Air Force Base, New Mexico" in a newspaper would not be of interest to a resident of Alpine, Texas, some 250 miles to the east. This title states this event is going to take place in New Mexico.

And, when we read the newspaper about a month ago, and saw "Proposed Expansion Of German Air Force Operations At Holloman Air Force Base, New Mexico", this, too, would not be of much interest to a resident in Marathon, Texas, 260 miles to the east. Only those who were not confused by the USAF's carefully constructed titles of such important announcements would attend the Public Hearings, and they did. The majority of citizens in the Trans-Pecos Area of Texas did not attend due to lack of awareness. As of this date, there is finally a feeling that the USAF cannot be trusted.

The results for the 1997 EIS Draft "Public Hearings" have been as it was for the Environmental Assessment of 1993. No one will represent the citizens of the Trans-Pecos Area of Texas.

Thirty-seven (37) people attended the public hearing on July 26, 1996. Of the ones who wrote or called the USAF for information, to our knowledge,

none of them have received any information as of July 28, 1997. The only response to telephone calls to the USAF was, "We'll look into it". No return calls have been received that we know of. At the June 24, 1997, Public Hearing on this EA, seventeen people attended to hear the bad news. Numerous telephone calls and letters have been executed, but to no avail. The delay in receiving any information from the USAF is one of the reasons we are presenting this complaint that these "Public Hearings" are UNFAIR.

The USAF personnel conformed to the requirements of the governing statutes. They did not advise how to contest these proposals, nor could they answer all our questions. There is no doubt that should there be another "Gulf Oil War", or other military confrontation, the desired training of the USAF personnel in the area of low-level combat flying is essential. However, the public has certain rights and privileges that must be paramount under the existing conditions. The United States of America is not at war. There is no National Emergency. Where may the public turn to for information and assistance in making a reasonable decision regarding a proposal by the Federal Government? What has happened to Private Property Rights?

Relative to the June, 1997 referenced EA, investigations show there is no assessment made concerning the SocioEconomic impact of this USAF proposal relative to the Trans-Pecos Area. There was no evidence of compliance with Executive Order 12898, Environmental Justice, issued by the President of the United States on February 11, 1994.

The USAF assumes that entering certain information into the Table of Contents, then entering the same information in whole, in part, or in error, constitutes a valid study or assessment; not so. It would be the same as saying, "The building is on fire. There is a fire station around the corner." But, everyone just stands there. Nothing is done about the fire. Very incompetent administration, or perhaps an attempt to conceal the true and correct conditions.

Our investigation shows there to be a series of errors, omissions and incorrect assumptions in the USAF's calculations of the Environmental Impact Concerning Pollution and Noise. There are technical errors such as incorrect training air speeds, the confusion of Knots Per Hour with Miles Per Hour and complete ignorance of the impact of gale force Vortex Winds across the surface of the ground. There is an incorrect assumption that any man or beast may live in health with a military jet fighter aircraft occasionally (twice daily, both night and day) flying over at 552 miles per hour 100 feet above their heads, magnifying the extreme pollution caused by unburned particles of jet engine fuel and poison gases driven into the ground and plants by the gale force winds. These conditions constitute a series of major impacts on the environment of the Trans-Pecos Area of Texas, yet have been omitted, have errors in the technical calculations, or have incorrect assumptions made

of them, as in the USAF impact study of our Biological Resources. The hearing and smelling ability of wild deer and humans is not the same.

There is no mention or assessment anywhere in this EA that addresses the impact on humans. Contrary to the USAF's thinking, the Trans-Pecos Area has not been "sparsely populated since World War II."

We think this EA is UNFAIR due to the total lack of attention paid to the tremendous impact that will be made on the Social and Economic structures of the Trans-Pecos Area. This part of the Environmental Protection Agency requirements was completely omitted from this EA and questions relating to the SocioEconomic Impact were lightly passed over during the "Public Hearings". No "straight answers". When asked specifically about this omission on June 24, 1997, Ms. Sheryl Parker stated she thought there was no need for a SocioEconomic assessment. There were only three of our nine questions the USAF could/would answer. We have tape recordings. We have witnesses to these "Public Hearings".

Our investigation shows that the citizens in the Trans-Pecos Area of Texas are very patriotic (or were). Comments and attitudes at the Public Hearings of 1993, June, 1996, June, 1997 and July, 1997, have shown a progressive deterioration of USAF credibility. No matter what the comments at public hearings were, the USAF gives no consideration to them. In the EA of 1996/1997 for "Proposed Airspace Modifications To Support Units At Holloman AFB", only two changes were made that we could determine. These were verified by the USAF. Neither related to comments by the public. Our investigation shows 92% of the public hearing attendees are against all three of these proposals. We are prepared to present witnesses, newspaper accounts and tape recordings. We would present court reporter transcripts if the USAF would release them.

We see no evidence that the results of these hearings, returned telephone calls or correspondence relative to this 1997 proposal will be any different from the 1993 and 1996/1997 Environmental Assessments.

In review, we reiterate our complaint that this EA is UNFAIR:

- (1) The Trans-Pecos Area of Texas is the last frontier for many things unique and beautiful. Careful planning of development is necessary. Low-level flights by jet fighters are not part of it.
- (2) A major part of the land is Prime Farm/Ranch Agricultural land. Our above-average Tax Rate by the State of Texas reflects this.
- (3) We have some threatened and endangered species that will be impacted by these flights.
- (4) These low-level jet fighter aircraft flights will affect public health and safety. The pollution will be very high throughout the entire area. Noise will be higher than that heard from any airport or airfield. The USAF demonstrates no technical knowledge or information on noise for this configuration of training exercises. There

- will be aircraft crashes.
- (5) The regional growth will deteriorate as our economy subsides due to damage to our tourist business, retirement living, motion picture industry and seasonal camping/hunting income, all of which are "new money" gross receipts.
- (6) Real Estate values will drop extensively in outlying areas. There is will possibly be a "hold" on development of some property until this issue is resolved. There may be uncertainty concerning the future.
- (7) These low-level flights will foreclose on future opportunities for private business to expand. The world is coming to the Trans-Pecos Area. It is no longer "sparsely populated" as the USAF claims.
- (8) The Environmental Assessment for modification of the Military Training Routes (MTR's) in the Trans-Pecos Area, particularly Instrument Route 178, set a destructive precedent for the area. We do not wish to see this precedent continue.
- (9) With the precedent established, the potential for expanded operations are guaranteed; expansion from a small USAF, to the small complement of the GAF, then all the USAF, then all of the NATO air forces, then anyone who will buy our second-hand military aircraft. There could be billions of dollars of profits at stake for monopolistic special interest groups.
- With respect to the excellent branch of our military service, the United States Air Force, our investigation indicates the USAF has not complied with the basic requirements of the National Environment Policy Act, and has, through errors, omissions and assumptions, misled the Environmental Protection Agency with the submittal of an incomplete EA.
- In our opinion, a finding of "No Significant Impact" for the referenced EA is completely without merit, as was the previous Environmental Assessment action in 1993.

Respectfully,



Harold Bryan Kelley, CPCM
Business Economist
P.O. Box 605
Alpine, Texas 79831
(915) 364-2323
FAX (915) 364-2299

Attachments:

Air Quality/Special Report by Consumer Reports Magazine of August, 1997.
This will impact USAF and other jet aircraft operations by FY2003.
For detailed information, write or call the above sources.

July 28, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
1219 Andrews Street
Langley AFB, Virginia 23665-2769
Certified Mail
No. P 074 820 661

Reference: Proposed Expansion Of German Air Force Operations At Holloman
Air Force Base, New Mexico
Draft, Environmental Impact Statement, June, 1997

Subject : Complaint that USAF Public Hearings and the resultant actions
are UNFAIR.

We consider the presentation of this Environmental Impact Statement (EIS) as UNFAIR due to the lack of documentation, communication or verbal instruction as to the procedures required, and to the misleading content of the title used for this proposal. For all practical purposes, there was no public notice issued to the citizens of the Trans-Pecos Area (Trans-Pecos Area is the area of Texas north of the Rio Grande River, west of the Pecos River and south of the Texas/New Mexico border). Ordinary citizens not intimately acquainted with such proceedings do not know who to, or where to turn for counsel. The very wording of the title is misleading. Reading this "Proposed Expansion Of German Air Force Operations At Holloman Air Force Base, New Mexico" in a newspaper would not be of interest to a resident of Alpine, Texas, some 250 miles to the east. This title states this event is going to take place in New Mexico. What's the German Air Force doing in New Mexico? The additional reference to "German Air Force Operations" would remove it further from the Trans-Pecos Area.

And, when we read the newspaper about a year ago, and saw "Proposed Airspace Modifications To Support Units At Holloman Air Force Base, New Mexico", this, too, would not be of much interest to a resident in Marathon, Texas, 280 miles to the east. How can you modify, or change, an air space? Units of what? Only those who were not confused by the USAF's carefully constructed titles of such important announcements would attend the Public Hearings, and they did. The majority of citizens in the Trans-Pecos Area of Texas did not attend due to lack of awareness. As of this date, there is finally a feeling that the USAF cannot be trusted.

The results for the 1997 EIS Draft "Public Hearings" have been as it was for the Environmental Assessments of 1993 and 1996/1997. No one will represent the citizens of the Trans-Pecos Area of Texas.

Sixty-four (64) people attended the public hearing on July 7, 1997. Of the ones who wrote or called the USAF for information, to our knowledge, none of them have received any information as of July 28, 1997. The only response to telephone calls to the USAF was, "We'll look into it". No return calls have been received that we know of. At the July 7, 1997, Public Hearing on this EIS, a "court reporter" recorded everyone's words. A large percentage of people filled out a USAF form to receive a transcript of this recording. As of July 29, 1997, no one has yet received it. The closing date for public comment is August 9, 1997. The delay in receiving any information is one of the reasons we are presenting this complaint that these "Public Hearings" are UNFAIR.

The USAF personnel conformed to the requirements of the governing statutes. They did not advise how to contest these proposals, nor could they answer all our questions. There is no doubt that should there be another "Gulf Oil War", or other military confrontation, the desired training of the USAF personnel in the area of low-level combat flying is essential. However, the public has certain rights and privileges that must be paramount. The United States of America is not at war. There is no National Emergency.

Where may the public turn to for information and assistance in making a reasonable decision regarding a proposal by the Federal Government?

Relative to the June, 1997 referenced EIS, investigation shows there is no assessment made concerning the Socioeconomic impact of this USAF proposal relative to the Trans-Pecos Area. There was no evidence of compliance with Executive Order 12898, Environmental Justice, issued by the President of the United States on February 11, 1994.

The USAF assumes that entering certain information into the Table of Contents, then entering the same information in whole, in part, or in error, constitutes a valid study or assessment; not so. It would be the same as saying, "The building is on fire. There is a fire station around the corner." But, everyone just stands there. Nothing is done about the fire. Very incompetent administration, or perhaps an attempt to conceal the true and correct conditions.

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the environment of the Trans-Pecos Area of Texas, yet have been omitted, have errors in the technical calculations, or have incorrect assumptions made of them, as in the USAF impact study of our Biological Resources. The hearing and smelling ability of wild deer and humans is not the same.

We think this EIS is UNFAIR due to the total lack of attention paid to the tremendous impact that will be made on the Social and Economic structures of the Trans-Pecos Area. This part of the EIS was completely omitted from this EIS and questions relating to the Socioeconomic Impact were lightly passed over during the "Public Hearings". No "straight answers". There were only three of our nine questions the USAF could/would answer. We have tape recordings. We have witnesses to these "Public Hearings".

Our investigation shows that the citizens in the Trans-Pecos Area of Texas are very patriotic (or were). Comments and attitudes at the Public Hearings of 1993, June, 1996, June, 1997 and July, 1997, have shown a progressive deterioration of USAF credibility. No matter what the comments at public hearings were, the USAF gives no consideration to them. In the EA of 1996/1997 for "Proposed Airspace Modifications To Support Units At Holloman AFB", only two changes were made that we could determine. These were verified by the USAF. Neither related to comments by the public. Our investigation shows 92% of the public hearing attendees are against all three of these proposals. We are prepared to present witnesses, newspaper accounts and tape recordings. We would present court reporter transcripts if the USAF would release them.

We see no evidence that the results of these hearings, returned telephone calls or correspondence relative to this 1997 proposal will be any different from the 1993 and 1996/1997 Environmental Assessments.

In review, we reiterate our complaint that this EIS is UNFAIR:

- (1) The Trans-Pecos Area of Texas is the last frontier for many things unique and beautiful. Careful planning of development is necessary. Low-level flights by jet fighters are not part of it.
- (2) A major part of the land is Prime Farm/Ranch Agricultural land. Our above-average Tax Rate by the State of Texas reflects this.
- (3) We have some threatened and endangered species that will be impacted by these flights.
- (4) These low-level jet fighter aircraft flights will affect public health and safety. The pollution will be very high throughout the entire area. Noise will be higher than that heard from any airport or airfield. The USAF demonstrates no knowledge of information or noise for this configuration of training exercises. There will be aircraft crashes.
- (5) The regional growth will deteriorate as our economy subsidies due to damage to our tourist business, retirement living, motion picture industry and seasonal camping/hunting income, all of which are

- "new money" gross receipts.
- (6) Real Estate values will drop extensively in outlying areas. There is now a "hold" on development of some property until this issue is resolved. There is uncertainty concerning the future. Our investigations show bank deposits and sales tax revenues are down from 1996.
 - (7) These low-level flights will foreclose on future opportunities for private business to expand. The world is coming to the Trans-Pecos Area. It is no longer "sparsely populated" as the USAF claims.
 - (8) The Environmental Assessment for modification of the Military Training Routes (MTR's) in the Trans-Pecos Area, particularly Instrument Route 176, set a destructive precedent for the area. We do not wish to see this precedent continue.
 - (9) With the precedent established, the potential for expanded operations are guaranteed; expansion from a small USAF, to the small complement of the GAF, then all the USAF, then all of the NATO air forces, then anyone who will buy our second-hand military aircraft. There could be billions of dollars of profits at stake for monopolistic special interest groups.

With respect to the excellent branch of our military service, the United States Air Force, our investigation indicates the USAF has not complied with the basic requirements of the National Environment Policy Act, and has, through errors, omissions and assumptions, misled the Environmental Protection Agency with the submittal of an incomplete EIS.

In our opinion, a finding of "No Significant Impact" for the referenced EIS would be completely without merit, as were the two previous Environmental Assessments.

Respectfully,

Harold Bryan Kelley
 Harold Bryan Kelley, CPCM
 Business Economist
 P.O. Box 605
 Alpine, Texas 79831

(915) 364-2323

FAX (915) 364-2299

Attachments:

Air Quality/Special Report by Consumer Reports Magazine of August, 1997.
 This will impact USAF and other jet aircraft operations by FY2003.

For detailed information, write or call the above sources.

Clearing the air

Is our air clean enough?

It was what scientists call a "natural experiment," a serendipitous way to study in this case, whether people would be healthier if the air were cleaner. An environmental economist at Brigham Young University spotted the research opportunity: A labor dispute had shut down the steel mill near Provo, Utah, for 13 months, removing the major source of air pollution (aside from cars) in the isolated mountain valley. The method he applied couldn't have been simpler. From the valley's three hospitals he collected counts of admissions for respiratory illness—before, during, and after the plant shutdown.

And the results could not have been more striking. When the mill was running, hospital admissions were 40 percent higher for bronchitis and 17 percent higher for pneumonia. Especially startling was the effect on preschool children: twice as many admissions for bronchitis and asthma.

vacuum cleaners, page 40.

Yet Provo's atmosphere didn't seem particularly bad. Even when the mill was in full operation, the valley's air was only slightly dirtier than national air-pollution regulations allow.

That 1989 study is one of many dozens in the past decade that point to a worrisome new conclusion: Our door air—even air that meets present pollution standards—still can be hazardous to your health.

Scientists have detected a stable and reliable connection between dirty air and health problems in dozens of communities large and small, old and new, in every type of climate, throughout North America.

So consistent is the association that epidemiologists can even estimate the annual U.S. toll from air pollution—about 50,000 deaths from heart disease, asthma, stroke, bronchitis, and the like. That's more people than die in auto accidents. Thousands of these deaths occur in places where air meets current national standards.

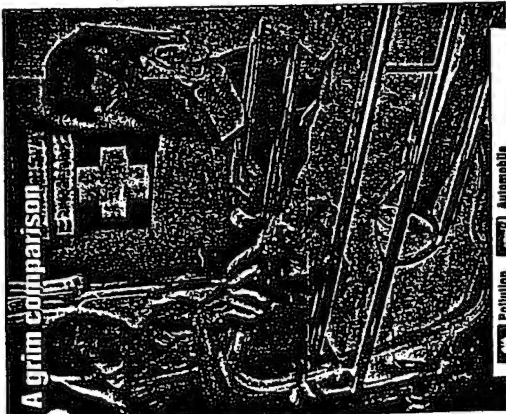
"I know of no other environmental risk factor where the exposure is so ubiquitous and the effects are so large," says C. Arden Pope, author of the Provo study.

After considering the evidence of previously unrecognized hazards, the U.S. Environmental Protection Agency (EPA) proposed strengthening air-pollution standards for the first time since 1990. The new regulations, which President Clinton endorsed in June, were expected to be published in July.

The proposal has elicited strenuous protest from industries that contribute most heavily to air pollution: oil, autos, utilities, and heavy manufacturing. Resurging arguments shaped during previous clean-air debates would threaten thousands of jobs and intrude on Americans' lives. They have sent dozens of lobbyists to churn up Congressional opposition.

And employing a tactic increasingly common in health and environmental controversies, industries have launched a direct attack on the science itself. Typical is a Mobil Corp. newspaper advertisement asserting that the link between air pollution and illness is "based on shaky science" that is "unraveling" and "incomplete."

However, a close look at this "shaky" evidence shows that it is anything but. The real debate, in our opinion,



Roll up the windshield study after study shows more deaths and hospitalizations when the air is bad. That leads to such calculations as this one: the number of deaths attributed to particulate air pollution in one year in several states' metropolitan areas, compared with the number of automobile deaths.

State	Automobile Deaths	Power Plant Deaths
Calif.	10,000	2,000
Ill.	2,000	8,000
Mich.	2,000	8,000
Ohio	2,000	8,000

Source: National Resources Defense Council

This change would mainly affect heavily populated regions that just barely meet current standards such as the upper Ohio River Valley and the Carolinas. These areas would likely have to do what regions with even more ozone pollution have already done: Crack down on polluting cars, require gasoline and solvents with less vapor, and—above all—make industries and power plants clean up more of their emissions.

Particulates. The current standard treats all small particles—those measuring less than 10 microns—as one group. It turns out that industries can meet this standard by controlling the largest of the group, such as soot and dust, while doing nothing about the very

fine particles—less than 2.5 microns—that remain now realize do the most damage.

The EPA's proposal would add a specific limit for the very fine particles—an annual average of 15 micrograms per cubic meter, with an allowable 24-hour "peak average" of no more than 65 micrograms per cubic meter. The change would save about 15,000 lives a year and avoid 8,000 hospitalizations, the EPA estimates.

This change would have its biggest impact on the coal- and oil-burning industries and utilities and on diesel vehicles, which have largely escaped strict regulation under present rules.

The current debate

Not surprisingly, those very same industries are leading—often with vigorous lobbying and public-relations campaigns against the EPA's proposal. Many members of Congress—especially from the industrial Midwest—have taken up opposition to the EPA's proposal. Besides dismissing the science as shaky, the opponents scoff at the EPA's claim that the new rules will cost less than \$0.40 a year while returning health benefits of up to \$120-billion. Industry puts the cost at closer to \$60-billion—and says the EPA has overestimated the value of the lives saved.

A lot of people argue it needs more study," says Joe Lardale, spokesman for the American Petroleum Institute. "You shouldn't be spending all that money if you're going to get minimal benefits."

In fact, it is difficult for anyone to predict the cost. Those industries have made the same threats repeatedly over the years, but when regulations have changed anyway, the predicted economic disasters haven't materialized. For example:

- In 1990, industry warned that federal rules requiring better sulfur dioxide pollution controls on large power plants (to control acid rain) would cost as much as \$1500 per ton

of pollution removed, while the EPA predicted \$500. Actual cost: \$70 to \$100 per ton.

- In the 1980s, oil companies resisted changing to a lower-vapor gasoline. "They complained that the cost of gasoline would shoot up 3 to 5 cents a gallon and that there would be long lines at gas stations," recalls Bill Becker, director of the Association of State and Territorial Air Pollution Program Administrators. "Nothing of the sort happened. The cost increase was a fraction of a cent."

Policy analysts say this happens because, when given no choice, companies come up with new technological solutions. In fact, a study commissioned by the American Iron and Steel Institute found that steel mills in the upper Ohio River Valley could comply with the EPA particulate proposal at "minimal cost."

It's also very difficult to put a price tag on the health benefits. There are many different ways of calculating the cost to society of death and illness.

Recommendations

Even if industries' cost of cleaning up exceeds people's cost of breathing dirty air, that's no excuse to do nothing about it.

"Pollution is hideously expensive already," says George Thurmon of the New York University School of Medicine's Institute of Environmental Medicine, the author of many air-pollution and health studies. "People are going to the hospital, they're taking medicines, they're taking sick days. What we are really talking about here is transferring the costs from the general public to the polluters."

As we said in our report, "Facing Our Fear" (December 1996), the debate on such questions needs to be shaped by public values, supported as much as possible by hard information. We endorse strengthening the nation's air-pollution standards. The science suggests that the health benefits would be great, history suggests that industry's costs will be less than advertised, and the public has consistently shown that it wants the Government to make sure the air is cleaner.

Legal And Ethical Brief No. 3836, August 1, 1997
Formal Complaint Against The Below Listed United States Air Force Proposals

Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley Air Force Base, Virginia 23665-2769

Attention: Ms. Sheryl Parker

Subject: The Proposed Actions Of The United States Air Force, Air Combat Command Relative To Low-Level Flights In The Trans-Pecos Area Of Texas

Proposals By The United States Air Force Are:

- (1) Proposal For Modification Of Air Space For Instrument Route IR-178, 1993
- (2) Proposed Airspace Modifications To Support Units At Holloman Air Force Base, NM, 1996
- (3) Proposed Expansion Of German Air Force Operations At Holloman AFB, New Mexico, 1997

Section I: Investigation by Investigating and Analyzing Group

As of August 1, 1997, the Trans-Pecos Area Association consists of forty one (41) active and contributing members, and 186 non-active contributing members. These members are unequivocally against additional German Air Force aircraft, United States Air Force aircraft, or any and all aircraft that would do any low-level training flights in the Trans-Pecos Area of Texas.

Our investigation of the referenced documents, witnesses and de facto occurrences shows a progression of deteriorating environmental conditions of the Trans-Pecos Area (TPA) relative to the implementation of the initial Environmental Assessment (EA) of 1993.

Projecting the compounding of the initial deteriorating source by implementation of the Environmental Assessment (EA) of 1996, through the Environmental Impact Statement, Draft, July, 1997 we find an increasingly deteriorating condition. The compounding of the volume of sorties along these routes in the TPA is to compound the deterioration of the environment.

Projecting the documented intentions of the United States Air Force, Combat Command, in the near future, accumulated evidence from the listed sources indicates a definite intent to compound the volume of sorties necessary to accomplish these training exercises. This compounding of training flights will end only with the establishment of a world-wide training facility dedicated to unknown years of activity and expansion. These actions will create immeasurable deterioration of the ecology and the environment of the TPA.

This Investigation and Analysis is based on the referenced documents, documented statements, claims and assumptions made by the United States Air Force (USAF), Air Combat Command (ACC), contained in the above referenced proposals, and from personal, letter or telephone interviews with residents, guests, travelers, students, land owners and other citizens of the Trans-Pecos Area.

This group of citizens constitute a class action representation of citizens in the Trans-Pecos Area. (TPA) The TPA covers the area west of the Pecos River, south of the New Mexico/Texas border and north of the Rio Grande River (Rio Bravo).

Our investigation is based on interviews with residents of Sierra Blanca, Alpine and Fort Davis, Texas, ranchers, campers, tourists and visitors who have witnessed USAF flights at low levels along Instrument Route (IR) 178 as shown on the El Paso Sectional Aeronautical Chart, 56th Edition, February 27, 1997, and generally from citizens from the TPA. Unrecorded interviews and conversations with witnesses are classified as "hearsay evidence", and may, or may not, be true and correct. Letters and taped conversations with witnesses shall be deemed to be true and correct. (The truth as they know it.) No sworn statements have been taken.

In 1993, the USAF, ACC, proposed to modify airspace to support USAF units located at Holloman Air Force Base (AFB), New Mexico. The proposed action was for the purpose of training USAF and German Air Force (GAF) units in low-level stealth maneuvers. In May of 1993, this action was assessed in an Environmental Assessment (EA) and a Finding of No Significant Impact completed in 1993. We assume this was the EA that lowered the minimum above ground level (AGL) to 100 feet for Instrument Route (IR) # 178 that is over Sierra Blanca and to the southeast. These training flights have been ongoing for some years.

In 1996, the USAF again proposed to modify airspace to support USAF and GAF units located at Holloman AFB, New Mexico. The proposed action was needed to meet expanded training requirements. Due to the progressive expansion of this training program, compensation was needed for increasingly limited access to White Sands Missile Range airspace. In May of 1996, 12 GAF Tornado aircraft were then stationed at Holloman AFB. As specific GAF Tornado mission-in-training plans were being prepared, they identified an additional requirement to perform long-range, low-level training flights (down to 100 feet AGL) as well as the need for low-altitude (down to 300 feet AGL) air-to-air combat training for both Tornado and F-4 aircrews training at Holloman AFB.

The GAF also identified additional need for air-to-air refueling at altitudes lower than currently available in the vicinity of Holloman AFB. This low-level refueling training would be as low as 1,000 feet AGL, and would be between two PA-200, or two F-4, fighter aircraft.

As a result of the above stated changes in requirements for this type training, the USAF proposed to lower the 500 foot minimum to 100 feet AGL.

Ignored by the authors of both the related EA's and the EIS, were the factors of these new altitudes and speeds relative to the ground level impact. The impact of these new altitudes of 100/300 feet AGL, 736 MPH aircraft speeds and 60 to 95,

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2

MPH winds must be assessed. These de facto long term conditions create an ALIEN ENVIRONMENT that is terminal for life forms on earth.

The USAF's EA determined these proposed actions are not expected to result in significant impacts to the natural or human environment. No significant impact on civil aviation is anticipated. These claims are a complete contradiction to known facts.

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NOTE: During the "Public Hearing" relative to the EIS, 1997, held July 7, 1997 at Alpine, Texas, we could obtain no USAF definition of (1) "sparse population" and (2) "significant impacts to the environment"

We assume anyone in a position of authority/responsibility in the USAF has a reasonable education, and a corresponding amount of experience, to differentiate between jet aircraft that take off, land and park at Holloman AFB, New Mexico, and the low-level flights over private property and private citizens in the Trans-Pecos Area of Texas. (Perhaps the lack of understanding comes from the fact these jet aircraft do not take off, land or park in Texas)

In 1993, lowering these Military Training Routes (MTR's) to 500 feet AGL minimum elevation, was the first mistake made. This accommodation for the military was done at a time when the size and power of aircraft was increasing, along with the Noise and Pollution. Any changes made in the minimum elevation for these MTR's should have been to raise them.

To compound the mistake, the minimum elevation was next lowered to 100 feet AGL. The aircraft engines became larger and more powerful. All this power is, of course, translated into tons of jet fuel. The Noise and Pollution became progressively more damaging to the Environment, and hence to the Ecosystems.

Relative to the Military Training Routes (MTR's) over the Trans-Pecos Area of Texas, none of the USAF's determinations of proposed impacts to the environment have proven to be correct. For information concerning IR-178 over Sierra Blanca, write to or telephone Bill Addington, P.O. Box 218, Sierra Blanca, Texas, 79851, or call (915) 369-2541.

Section II: Analysis by Investigating and Analysis Group

These actions, and these progressive proposals for expansion, are a destructive and unreasonable intent. These are 45,000 to 60,000 pound aircraft flying at 500 to 736 miles per hour (MPH) 100 to 300 feet AGL. This series of events creates a unique physical reaction of explosive sound and air movement that humans, animals and plant life are not naturally exposed to. This transformation of energy is a law of physics. It's a destructive force, both physically and mentally.

There is a tremendous amount of energy generated by the burning of jet fuel through one or more engines; generating 30,000 pounds thrust, converting this energy to a motion of mass, heat, noise, wind and polluting gasses and unburned jet fuel.

What has been created is a completely ALIEN ENVIRONMENT.

All this action is taking place 100 to 300 feet (or lower) AGL. In this 300 feet of space are life forms. There are birds in the air, plants and animals on the surface of the ground, and micro-environments under the surface. These life forms constitute ECOSYSTEMS.

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None of these ECOSYSTEMS are compatible with this ALIEN ENVIRONMENT. These ecosystems contain HUMANS. Our investigation explains where this ALIEN ENVIRONMENT originated, and our analysis explains how it is created.

The originators of this series of unreasonable acts, known as a USAF training program, have obviously never been at the ground level position of these equations in physics with a piece of machinery of this size, sound and velocity flying over their heads. Our analysis shows these ecosystems will be severely damaged, will either mutate or die in this ALIEN ENVIRONMENT.

Section III: Results of Investigation and Analysis; History

A brief history of the progressive development of putting the wrong type of combat training in the wrong place. We must keep in mind the fact that these progressive steps were premeditated to overcome resistance from he residents of the private land to be utilized by these low-level fly-overs.

- (1) In 1991, moving the 37th Fighter Wing from Tonopah Test Range, Nevada, to Holloman AFB, New Mexico. This made changes in the MTR's over Texas and New Mexico necessary, including the 100 feet AGL low-level flight training with the F-4 fighter craft. First illegal act by the USAF. (Pg. 2-1, EA, 1996, Final)
- (2) In 1991, moving eighteen (18) F-4 aircraft from George AFB, California, to Holloman AFB, New Mexico. (Pg. 2-1 & 2-2, EA, 1996, Final)
- (3) In February of 1993, the USAF completed an EA to locate 12 GAF PA-200 aircraft at Holloman AFB. This EA described and analyzed training for the GAF at low-levels. This move was done by the USAF knowing the facilities were inadequate, and would have to be expanded. (Line 3, Pg. 2-1, EA 1996) Second illegal act in the progression by the USAF. (Pg. 2-1 & 2-1, Lines 6 through 9, EA, 1996)

As described in the USAF documents for the EA, 1996/1997, the completed illegal modifications are based on faulty or non-applicable technical data, a series of erroneous assumptions and misleading statements such as on Pg.2-5, lines 1, 2, 3, "No ground disturbing activities would occur as a result of the proposed modification or use of the MTR's".

At this point in this analysis, we might conclude the USAF has mislead the public with a conglomerate of factual statements mixed in with non-factual statements.

The objectives of this training are for the best interest of the USAF. They just happen to be the right idea in the wrong place.

- (1) The necessary components for this training, as we understand it, are: jet fighter/bomber aircraft that can perform the maneuvers necessary to fly over rough mountain terrain at a speed close to sonic, be able to maneuver down canyons, through small "cuts & saddles" and between hills, all to avoid Electronic or visual detection. Flying at the correct speed means "not being heard until the aircraft has passed any anti-aircraft guns or troops". Low to the ground helps block laser or radar detection by being in a canyon, valley or between two hills. Ask the home and business owners in Sunny Glen sub-division on the west side of Alpine, Texas about this; they don't like it.
- (2) We now have the correct aircraft and the correct technology for the air-craft. Now, all we need is the correct geographical location in the Environmental

Impact Statement proposing the addition of 30 additional GAF fighters, there is a statement that relates to the geological and geographical structures desired: high, semi-arid mountains, fair weather, not too hot and not too cold and sparsely populated; the Trans-Pecos Area of West Texas. A duplicate of the Zagros Mountains of Iran.

Prior to the initiation of this training program into the TPA, the natural conditions of the area were as follows:

- (1) There was a growing, permanent population of several thousand humans living in the area. Some are permanent residents, some are visitors, some come for business reasons, some are passing through.
- (2) We had a clean, healthy environment. It is also quiet.
- (3) We had long views and majestic scenery, unlike Pennsylvania, New York or California. In photographs of these places, you do not hear the noise or smell the pollution.

The Trans-Pecos Area of Texas is a vast expanse of open country relative to Pennsylvania, New York or California. So is New Mexico, Montana, Idaho and other states and areas of the United States (US). At this time, there are thousands of people in this area. Our population and economy are small because we have few factories, shipping, financial centers or silicon valleys. This remote area is clean, and the people here are honest.

Section IV: Technical Analysis

The following are major parts of this complaint. We have used the available technical information published by the USAF in the 1993 EA, the 1996 EA and the 1997 EIS, to formulate the above and following opinions.

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To qualify the proposals for this new training center, the USAF used the available environmental studies from the two EA's of 1993 and 1996, and the EIS of 1997, and applied them to a geographic location for an incorrect activity and place.

- (1) All data concerning noise and pollution are predicated on Airports, Airfields and Air Bases. Very few people are exposed to this type of noise or pollution without adequate protection. We drive to any commercial Airport in our car, a taxi cab, bus line or such. You may, or may not, hear large airliners taking off or landing. They are high above you, or take off going away from you, and aircraft noise you hear grows progressively louder, passes over and grows progressively quieter.

In the sound-proof Air Terminal, we hear no roar of jet engines. After boarding our flight, we are towed away from the gate, and turned in the correct direction. Or, if we load onto our flight up some stairs, we may hear one jet engine that is difficult to talk over. Once seated, doors closed, we hear and feel the jet engines increase power, and we start our taxiing run.

Within the Airliner, we can talk with no difficulty, may read, or gaze out the window. We get to the end of the runway, the pilot gives full throttle to the engines, and we start our take-off. The noise increases considerably, we smell

nothing, we can still carry on a conversation and feel only a slight vibration of the jet engines. There is still no adverse feelings, sounds, odors or sights.

(2) But, stop the story here and THINK for a moment. The ground crew, on start up of the jet engines, were all wearing respirators, ear plugs, ear muffs, long sleeved jump-suits, gloves and caps. They were on the other side of the wall that screened us from the extreme noise and pollution.

(3) In the Trans-Pecos Area, we have been forced, against our will and better judgement, to the wrong side of the wall. Have you ever seen motion pictures of what a Navy Aircraft Carrier is like when launching aircraft? There are Video Tapes of the sights and sounds, but not the odor, of Aircraft Carrier Operations. When a USAF jet aircraft flies over us at 552/736 MPH, 100 feet AGL with no warning, it's worse than being a member of the flight crew on an Aircraft Carrier, as we have no special suit, no gloves, no ear plugs, no ear muffs and no respirator. The situation can be simply explained: We are on the wrong side of the wall.

WJ-323

(1) Airspace Use And Management:

Lack of correct management by the authorities at Holloman AFB is demonstrated in the conduct of the pilots in training. There are numerous documented accounts of accidents caused by these low-level flights, loss of sleep, difficulty in caring for injured or sick people and the non-compliance of the USAF's stated policy that there would be "no flights over towns, residences or businesses". We are frequently used for "target practise" or markers for reference.

There is little possibility any of the citizens (victims) affected by these flights will be wearing, or have access to, protective devices equal to the pilots and ground crews of these aircraft.

(2) Noise:

Lack of correct USAF calculations of high noise levels on MTR's, especially on routes IR-178, IR-102/141 and IR-122/130, are a result of "Models" that are not applicable to the low-level training flights over long-range MTR's proposed by the USAF. To compound the mistake, these "Models" are weighted averages based on the incorrect air speeds and time frames.

There is a lack of relativity to the true and correct conditions relative to these low-level flights as they impact the people, animals and plants on the ground. This lack of understanding is clearly shown in the USAF's Figure 4.1-2, Page 4-7, Noise Exposure From A Single Overflight Of A PA-200 at 100 feet AGL. Compare this with the true and correct Noise Exposure showing the actual explosive noise existing, in conjunction with the gale force blast of air in Figure 4.1-2, Page 4.7 as modified by the Investigation and Analysis Group.

The "Models" script and references to noise in this section, Page 4-5 through Page 4-47 and Appendix "C" do not relate to the noise factors, circumstances or scenarios created by flying MTR's at 100 feet AGL at speeds up to 621 MPH. In USAF Figure 4.1-2, Noise Exposure, note the values used in creating this Figure 4.1-2. There is the Model of the Aircraft, a time frame, a decibel quantity, but no speed factor.

Figure 4.1-2 also shows the standard limit of 125 decibels of noise allowed by the governing authorities, who are the Department of Defense (DOD) (War Department) and the Federal Aeronautics Administration (FAA).

In the Figure 4.1-2 created by the Analyzing Group, we have interpolated a speed factor of 736 MPH to a decibel quantity of 142 decibels. This speed of 736 MPH is approximately the speed of sound at an altitude of 5,400 feet Mean Sea Level (MSL). In Figure 4.1-2, the USAF uses a lower aircraft speed in order to meet the lower sound limit of 125 decibels. This variance in speed factors will effect the amount of noise. The lower the speed, the lower the noise; the farther below sonic speed, the more likely for a warning sound.

See USAF Figure 4.1-2, Page 4-7, EA, 1996 and Analysis Group Modified Figure 4.1-2. Comparison will provide a reasonable picture of the true impact of these unannounced training flights.

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(3) Land Use:

The basic approach to this category is this statement by the USAF: "However, relative increases in noise and potential overflights experienced in portions of west Texas would appreciably alter the natural quiet for scattered rural residents". This is true at the present time. In the near future, it will be more so.

The USAF has ignored the de facto use of the 10,000 plus square miles of private property to be used in these training exercises. There are court decisions in the past that have determined what constitutes trespass on private property from the air space above.

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As of the last "Public Hearing" held by the USAF in Alpine, Texas, July 7, 1997, the USAF had made no effort to address the issue of Private Property Rights. When ask why this was not done, and was totally ignored in any of the EA's or the Draft EIS, July, 1997, relative this "Public Hearing", Ms. Sheryl Parker replied, "Private property rights do not constitute a part of a military Environmental Impact Statement".

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This is totally untrue. As this is a major impact area, due to the lowering of the AFL flights below 500 feet, it is necessary for the issue of Private Property Rights to be a part of this EIS. (See Appendix "C", EPA Handbook, Guidance To Applicants For New Source NPDES Permits)

WJ-327

(4) Air Quality:

The lack of true and correct USAF calculations based on higher-than-published aircraft operating speeds and actual flying conditions has failed to show the true and correct extent of pollution along IR-178, IR-102/141 and IR-122/130, in west Texas as well as the remainder of the routes and ranges. The USAF does not publish in the EA, 1996 or the EIS, 1997, data that is possible to check. To avoid redundancy, relate the basic methodology used by the USAF in Section 4.2, Noise, to this exercise in claims concerning Air Quality. The Charts, Figures, script and other engineering resolutions do not apply to the low-level training flights over the MTR's in the TPA of Texas. In some instances, they do not apply to Holloman AFB operations.

WJ-328

(5) Biological Resources:

The basic statements in both USAF EA's and the EIS assume there will be no long-range impact on plants or animals, whereas there are areas now being impacted along IR-178, from the identical training flights that will take place on IR-102/141 and IR-122/130.

An unnatural, chronic disturbance of any wild animal is cause for it to leave the area. This action will partly depend on the availability of the proper food, ample clean water and shelter. There will definitely be a migration of mobile animals from under these MTR's. If they could, all domestic livestock would also leave, but they are generally fenced in.

Occasionally, they will not leave an area for any reason. The variables have to do, of course, with survival. In high and normal rainfall years, game herds will scatter if chronically disturbed by alien noise. In normal and low rainfall years, they wouldn't leave unless very stressed. All animals respond to alien occurrences in different ways.

Hunting leases constitute a large proportion of income in today's Trans-Pecos Economic Environment. Some ranching operations could not exist without them. We have information relative to the years of low-altitude flights along IR-178 concerning the destructive impact on Biological Resources. Contrary to the USAF's opinion, all biological life forms are damaged by these low-level flights. Jet fighters flying at 100 feet, or 300, or 500 feet is just too low for natural life forms to tolerate.

IR-102/141 passes over a rare herd of Elk located just west of the town of Marathon, Texas, south of the Glass Mountains. Low-level flights over the wide valley and mountains they range in will be damaging to this Elk herd program.

(6) Archaeological, Cultural And Historical Resources

We have had no response in writing from the Texas Historical Commission. The Commission has, however, shown an interest in our investigation and complaint, as they have received no response from the USAF to their request for information relative to these proposed additional flights.

(7) Water Resources

We have no knowledge of any impact concerning the water resources in New Mexico. We do have knowledge of impacts concerning windmills and other water supplies in Texas. We have eyewitness accounts of windmill fans torn up by the high winds of jet aircraft deliberately flying as close as possible to them.

(8) Hazardous Materials and Waste Management

We are primarily concerned with the spilling of jet fuel and the known amounts of CO, NOx and Particulates polluting the TPA.

(9) Socioeconomics:

W-330

There is no Social/Economic assessment made in any of these EA's or the EIS, concerning the Social/Economic Structure of the Trans-Pecos Area. The USAF consistently ignores the social structure, minority races and the economic status of the majority of the citizens of this area, in direct contradiction to:

W-331

(1) Presidential Executive Order #12898, Environmental Justice, page 3-121, para. 3.9.8 and Figure 3.9-1, page 3-122

(2) The fragile economic balance between an expanding economy versus a subsistence, or decreasing economy.

The economy of any Trade Area depends on the ratios of "new money" to subsistence income. At the present time, the Trans-Pecos Area is primarily an agricultural community, but with several incentive programs managed by a combination of the Texas Commerce Department, private donations in the Trans-Pecos Area and a newly established local organizations, we now have a growing trade area. This USAF training program is directly counter-productive to all our efforts. Detailed information of our accomplishments is available on request.

In order of cash-flow volume of "new money" into this Trade Area, the following are the known sources:

- A. Cattle, sheep, goat ranching, hunting/camping leases
- B. Sul Ross University, Texas University System
- C. Retirement population/new construction
- D. Welfare recipients
- E. Tourist Visitors
- F. Southern Pacific Railroad Employees
- G. State and Federal Employees
- H. Motion Picture Industry

The retirement and tourist economics have been on the rise the past 5 years. The motion picture industry has been steady for 8 years, and has gained slightly in the past five years. For a while, there was a decrease in these three "new money" sources. It could have been the national economy, or it could have been the drought. We doubt it was related to USAF actions along the MTR's in the area. That will come later. The citizens of Alpine, one of the larger towns in the Trans-Pecos Area, (population 6,480) have just begun to be exposed to the low-level flyovers. The citizens living in towns have yet to grasp the concept of the eventualities, with the exception of Sierra Blanca, Texas, where the low-level jet aircraft are flying through town at this time. Since 1992, there has been an equal growth of population in the outlying county areas, relative to growth of the town populations.

In Alpine, three motels have been built in the past three years. When interviewed, the managers informed us their studies indicated there would be an increase in occupancy from three sources: (1) The increase in enrollment at Sul Ross University brings more friend and family related visitors, and (2) the vacation overnight facilities at Big Bend National Park would not be expanded due to cuts in budget by the National Park Service (NPS), and the controversy over NPS

service contractors, (3) There are more day hikers and day campers in the surrounding country side.

The ratio of "destination" vacationers to "transient" vacationers has become closer each year since 1986.

Outside the towns, in the counties, private land owners are planning additional business enterprises. As an example, there is 71% more new construction in the county areas than in Alpine, Texas. Cattle, sheep, goat ranching, hunting/camping leases business enterprises have plans (hearsay evidence) to provide destination facilities for camping vacationers.

These camp grounds will be constructed in very beautiful, high altitude country. Initial plans are for a number of well-arranged campsites with electricity, potable water, rest rooms, showers and access to hiking and helping ranchers with their goat, cattle and horse operations (Dude Ranching). All this at a cool summer altitude of 4,400 to 6,400 feet AMSL. These are mostly small camp grounds for families.

There are also plans for apartment and office buildings in scattered, rural locations, but none will start construction until this low-level flying is stopped.

The present impact of low-level training flights by the USAF has been noticed by various tourists, hunters, campers and mostly by the private businesses related to outdoor activities as well as the ranching businesses and the ranch employees.

There is another tier of Socioeconomic Impact. With the progressive expansion of these sorties up to approximately 22,252 per year, 89 per day, the danger of highway accidents will increase, as will accidents to ranchers, ranch employees, private aircraft, hunters, hikers, campers and eventually to residents of the towns in the area.

(10) Transportation:

We have no comment on this section as it does not effect the Trans-Pecos Area.

(11) Utilities:

We have no comment on this section as it does not effect the Trans-Pecos Area.

(12) Soils:

We have no comment on this section other than a concern with these jet fighter aircraft blowing dirt in our eyes and down our shirts.

(13) Safety:

We can acknowledge the fine technical work involved by highly skilled mechanics, electricians and electronic experts that make up the ground crews of the USAF and GAF at Holloman. Our main concern is the ever present "human error" and the natural law of chaos. This entire proposed training program of low-level training flights reminds us of a long ago conversation with then Colonel "Chuck" Yeager. He stated the average career percentage of mortality for fighter

pilots in the USAF was 31.2%. The USAF pilots in these proposals are trainees. May God help them.

Until a year ago, the safety factors and documented accidents related to the citizens of the TPA show a small incidence of injury or death due to these low-level flights. Based on the past actions of the USAF fighter pilots, with the increased low-level training flights, there will be an upward progression of aircraft-related accidents among the citizens on the ground and in private aircraft.

A personal account of what we think were scouting flights from Holloman AFB by USAF jet aircraft prior to the presentation of the EA, 1996.

"In April of 1996, at about 1:30 pm while working on a flat-bed trailer at the barn, there occurred a sudden explosion, then a roar that diminished and became a fast moving jet aircraft. There was no warning. The noise made my ears ring, the gale force winds made me stagger, and I had dirt in my eyes. Fortunately, the barn broke up some of the noise energy and the wind.

"In May of 1996, at about 4:30 pm, while working in the open on some water-well controls, there was a slight buzzing sound for a split second, then another explosion of sound and air. There was no warning as this jet aircraft came directly over me. The combined energy and gale force winds knocked me off my feet, blew dust, twigs and grass in eyes and nose, down my shirt and stung my face. Then the roar diminished as the jet fighter flew off. I picked myself up and pulled the thorns from my left hand. It was then I became curious about the source and purpose of these jet aircraft.

"The third incident occurred three days later while I was walking toward the job-site to take measurements. This time, there was a split-second roar to a crescendo, a blast of sound, but no wind. This was a USAF jet fighter aircraft that passed about 250 feet to the east of me, close enough to the ground to stir up dust, whip the tops of juniper brush around, and then drop down out of sight through a cut in the hills into the lower elevations of the Alpine, Texas area. My property is 5,400 feet elevation MSL."

Our access to competent emergency treatment is Odessa, Texas, 3 hours and 15 minutes away. We have an emergency facility in Alpine, Texas, 20 minutes to 1 hour and 45 minutes away, that is staffed by technicians and nurses.

There are numerous accounts of citizens who have had dangerous and frightening experiences with low-flying jet aircraft flying under 100 AGL. Incidences of flying at vehicles head-on over a high-speed highway; timing the vehicle to pass just in front of it at 50 feet AGL; chasing motorcyclists on the highway and three jets playing with a vehicle on the highway to see who could get the closest, have been reported to us. These MTR's cross state and federal highways thirteen times in the Trans-Pecos Area.

People have also been blown off ladders, blown off their feet and startled enough to drop objects and horses startled enough to throw their riders.

Cumulative Impacts:

(1) It is imperative for the EPA to conduct tests and experiments to determine what the true and correct impact of these low-level flights will have on all phases of the environment. At this time, we can discover NO BENEFITS from such UNREASONABLE ACTS, but find numerous destructive results.

(2) It is possible for us to extract true and correct data from standard engineering books available in our libraries to contradict the USAF claims. We can only assume the USAF calculations are mathematically correct. The base factors are what are not reasonable.

However, we have determined there is a direct responsibility for the USAF to include this information in its EA's and EIS's submitted to the EPA for review, and we should abstain from interfering with this process.

If necessary, we will publish engineering data from independent, public sources. These data show unreasonable differences in most of the USAF's claims and our claims. It is our opinion, based on the engineering data used to arrive at the Published Airspace Use & Management, Noise, Air Quality, Safety and Socioeconomics, Biological Assets, that none of these subjects have been correctly addressed by the USAF. There is no assessment of the Social/Economics of the TPA per say.

(3) There is a progression to this series of USAF proposals that has yet to reach its ultimate goal. The USAF has provided us with extensive information concerning the future of these training programs set out by the two EA's and the EIS.

The USAF started with a few fighter aircraft for special units to become proficient in the type air warfare proposed to be taught with these programs based at Holloman AFB. There were objections exactly like ours to this training taking place at scattered USAF bases across the USA. There were efforts to do this type training in England and Germany, to no avail. The training programs were ejected from those countries.

The final progression, according to information received from the USAF, is to establish, maintain and operate a world class training facility for this low-altitude combat training to be shared, for a price, by all USA military air power, all North Atlantic Treaty Organizations and all other nations that choose to purchase our military aircraft, old or new.

The possibilities for destruction of the TPA ecology and environment are endless. There will be additional Military Training Routes (MTR's) established, then there will be a need for super-sonic training flights.

The pity of it all is the total lack of necessity for any of this. There is no logical explanation for this need. The USA is not at war. There is no national emergency. The only foreseeable wars are those the USA will initiate.

Harold Bryan Kelley
Harold Bryan Kelley, CPCU
Government Contract Law
P.O. Box 605
Alpine, Texas 79831

(915) 364-2323

FAX (915) 364-2399

Attachments:

- Figure 4.1-2, page 4-7
- Figure 4.1-2, page 4-7 amended
- Figure A-1, page A-4

UNITED STATES AIR FORCE CALCULATIONS OF A JET AIRCRAFT FLYING SLOWLY OVER A PERSON.

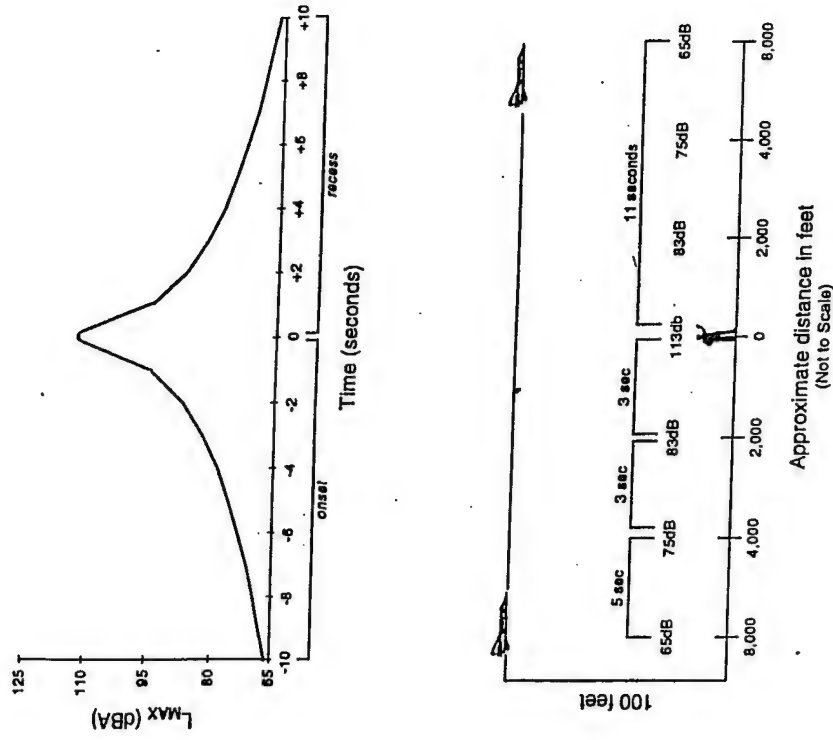


Figure 4.1-2 Noise Exposure from a Single Overflight of a PA-200 at 100 Feet AGL.

CORRECTED FIGURE 4.1-2 BY INVESTIGATION AND ANALYSIS GROUP
TRANS-PECOS AREA OF TEXAS

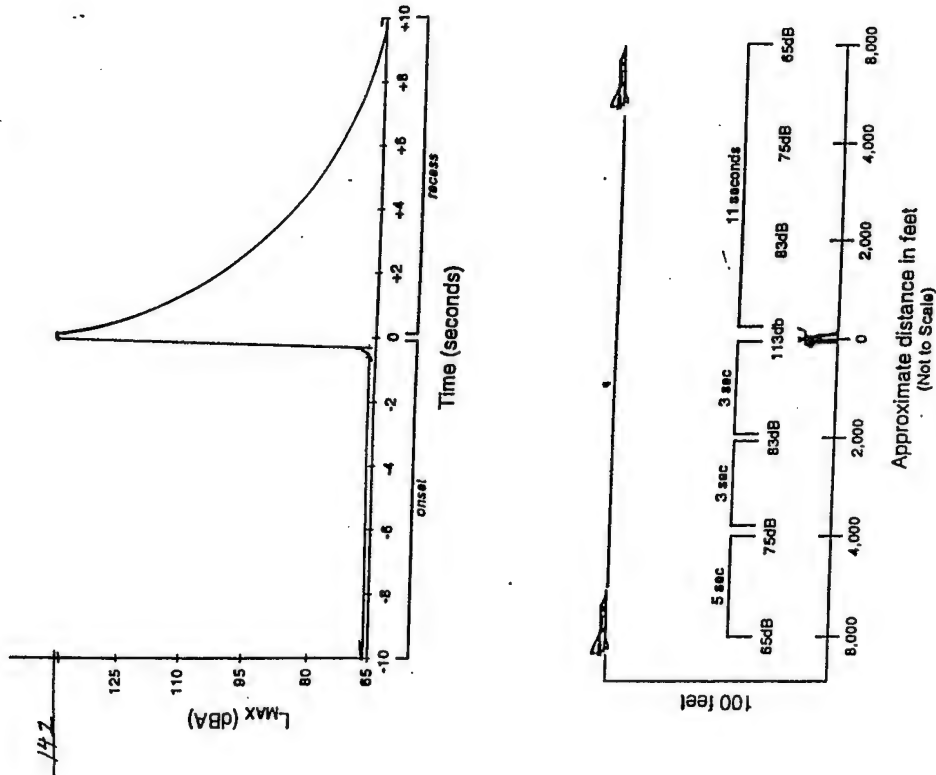
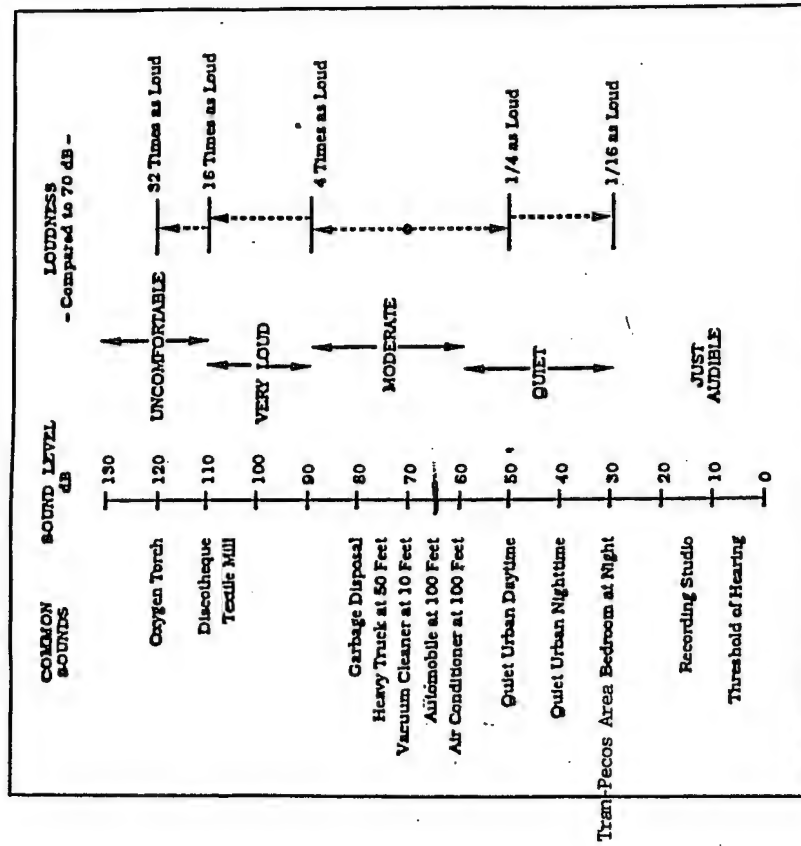


Figure 4.1-2 Noise Exposure from a Single Overflight of a PA-200 at 100 Feet AGL.

Figure A-1 Typical A-Weighted Sound Levels of Common Sounds.



Source: Handbook of Noise Control, C.M. Harris, Editor, McGraw-Hill Book Co., 1979

ACRONYMS AND ABBREVIATIONS

AAA	antiaircraft artillery
AADT	annual average daily traffic
AAQS	ambient air quality standards
ACC	Air Combat Command
ACEC	Areas of Critical Environmental Concern
ACHP	Advisory Council on Historic Preservation
ACR	Armored Cavalry Regiment
ADA	Air Defense Artillery
AFB	Air Force Base
AFI	Air Force Instruction
AFOSH	Air Force Occupational Safety and Health
AFR	Air Force Regulation
AGE	aerospace ground equipment
AGL	above ground level
AICUZ	Air Installation Compatible Use Zone
AIRFA	American Indian Religious Freedom Act
ALCM	Air-Launched Cruise Missile
AMRAAM	Advanced Medium Range Air-to-Air Missile
APS	Alamogordo Public Schools
APZ	Accident Potential Zone
AQB	Air Quality Bureau
AOCR	Air Quality Control Region
ABs	aerial refueling routes
ARTCC	Air Route Traffic Control Center
ATACMS	Army Tactical Missile System
ATC	air traffic control
ATCAA	Air Traffic Control Assigned Airspace
AUM	annual unit month
BAI	Backup Aircraft Inventory
BAM	Bird Avoidance Model
BASH	Bird-Aircraft Strike Hazard Program
BLM	Bureau of Land Management
BNA	block numbering area
CAA	Clean Air Act
c	cubic centimeter
CEQ	Council of Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
CY	calendar year
dB	decibel
dBA	A-weighted decibels
DFCS	Defense Fuels Supply Center
DNL	Day-Night Average Sound Level
DOD	Department of Defense
DOPAA	Description of Proposed Action and Alternatives
DRMO	Defense Reutilization and Marketing Office
ECM	Electronic Countermeasure
EIS	Environmental Impact Statement
EOD	explosive ordnance disposal
EPA	Environmental Protection Agency
ERINT	Extended Range Intercept Technology

Aug 10, 1971

Sheryl Parker,

Re: Noise on Training Routes
near Holloman AFB, N.M.

The existing noise from large planes and helicopters flying overhead creates a roar that interferes with TV viewing when we have windows and doors open, shakes us up into morning, windows are open, and throws out an outdoor conversation. The number of flights and frequency of flights seem to be increasing -

I'm enclosing a sketch of our location - Van Light Station in modified to shield this area South of Alamogordo?

See Enclosure
cc: County Commissioner
cc: Capt. Perry, HAFB, N.M.

Every thing was made of wood, he said as his wife bought from the store," he said as his wife arranged the tiny furniture and opened the door to the bathroom where a Lilliputian white tub sat, half full of bath water.

Behind him, a woman carried in a hand-made fiddle, with a carefully shaped, hand-rubbed, walnut back; tiny inlaid blue beads bordering the



LILLIPUTIAN CREATION - Weiss Heinrich stands next to a hand-made doll house he created and is entering in the Otero County Fair.

Thursday, Aug. 14:
Fair Parade, rained out Tuesday night is rescheduled for Thursday night at 6:30 p.m. starting at College Avenue and 10th Street.
Goat show, 9:30 a.m.; Fair, 11 a.m. to 4 p.m.; Ag. Mechanics Judging, 1 p.m.; Sheep show, 6 p.m.; Country music showdown, 7 p.m.

Air Force: training routes, bombing range separate issues

•Air Force colonel stresses that the two matters are under independent consideration

By SHARON ANDERSON
Daily News Staff Writer

During a Monday meeting with local officials and Air Force representatives, Col. Ron Oholendt made it a point to stress that the matters of low-flying training routes and the bombing range complex being proposed for the German Air Force are two separate issues.

The two are in no way connected, he said.

Holloman Air Force Base has made a separate request to the Federal Aviation Administration (FAA) for two additional training routes. Whether the bombing complex is a go or not, Oholendt said, that request will be considered separately based on the findings presented in a recently completed Environmental Assessment (EA).

Even so, the subject of low flights did come up Monday because the effects of noise from low-flying aircraft are also addressed in the Draft Environmental Impact Statement (DEIS) on the bombing range.

The final EA states the training flights would have no significant impact on Otero County life, a statement some people have taken exception to.

Local rancher Bob Jones, for one, said the so-called "average" noise levels cited in the EA are misleading.

"Average level means nothing," Jones

when planes are flying low overhead and when they're not? he asked. Someone used the analogy, "It's like putting one hand in boiling water and the other in freezing water and saying the person ..., on average, feels fine."

Jones asked Oholendt what happens down the road if the Air Force decides it wants even more air space? "It's been our experience that when a foot gets in the door, the whole body comes through," he said.

"You have understandable, legitimate concerns and the Air Force wants to address them," Oholendt said. "But I can't tell you that we're never coming back again." Over the years, he said, the military's needs change.

Contrasting today's capabilities with those in the Vietnam era, Oholendt said, "weapons, weapons systems and tactics are more capable today, but we need more air space to train effectively." And some of that training, he added, involves low level flying.

"What you are saying is," Jones replied, "We'll try not to hurt you but we're not gonna give no guarantees."

"That's right," Oholendt said.

Concerning both issues at hand, Jones said, "You're talking about a trade-off but (the ranchers) have been doing all the trading. I don't want you there. We think we've done enough and have given enough and that's that. Nothing you say is gonna make us happy unless you say you're gonna do something different."

Aubrey Lewis, a retiree from Mayhill had his own concerns. According to FAA surveys taken of residents in already noisy urban areas near airports, Lewis said, "noise begins to get annoying at 55 decibels." But 55 decibels is 10 less than

as the Air Force's comfort range, he noted.

"And decibel levels are not arithmetic, you can't add 'em up," he said. Later, during a recess, Lewis explained to the *Alamogordo Daily News*, that decibel levels are exponential to about the eighth power. When the noise at a decibel level of 60 doubles, the decibel number does not. "It only increases by 3," he said.

One Air Force representative said no real environmental standards exist for determining noise levels. "Some studies have been done to try to estimate the actual noise and day/night average sound levels to compare dissimilar areas using the same scale, but it doesn't really tell you the noise levels."

In a phone interview Tuesday, Capt. Larry Cox of Holloman's Public Affairs Office, said just because the Air Force gets a new training route doesn't mean the public's concerns are ignored. On the contrary, he said, the Air Force takes very seriously any noise complaints received, including along existing training routes. "If we don't," he said, "those routes will be taken from us."

As part of its overall Air Space Management Program, even if one family at one house complains, Cox said, that spot

gets marked on the map as an area for pilots to avoid when they plan missions. "We try to make some type of change to route the traffic either around or above the structure," he said.

The Air Force is also aware, Cox said that conditions change over time beneath the designated routes.

"Along with the air space comes responsibility for management," he says. "Things change, people move in and out new homes and buildings go up." These must all be taken into consideration and the route must continually be modified he said.

Though it's too late to do anything, except appeal the EA, the Air Force is still accepting public comments on the DEIS pertaining to the bombing range.

The comment period has not been extended or reopened, but Oholendt told those present Monday that the Air Force will consider any relative comments it receives.

To be considered for inclusion in the final EIS however, he said comment should be submitted in writing before the end of the month to: Sheryl Parker, Headquarters Air Combat Command/CEV, 129 Andrews St., Langley Air Force Base, Va., 23665-2769.

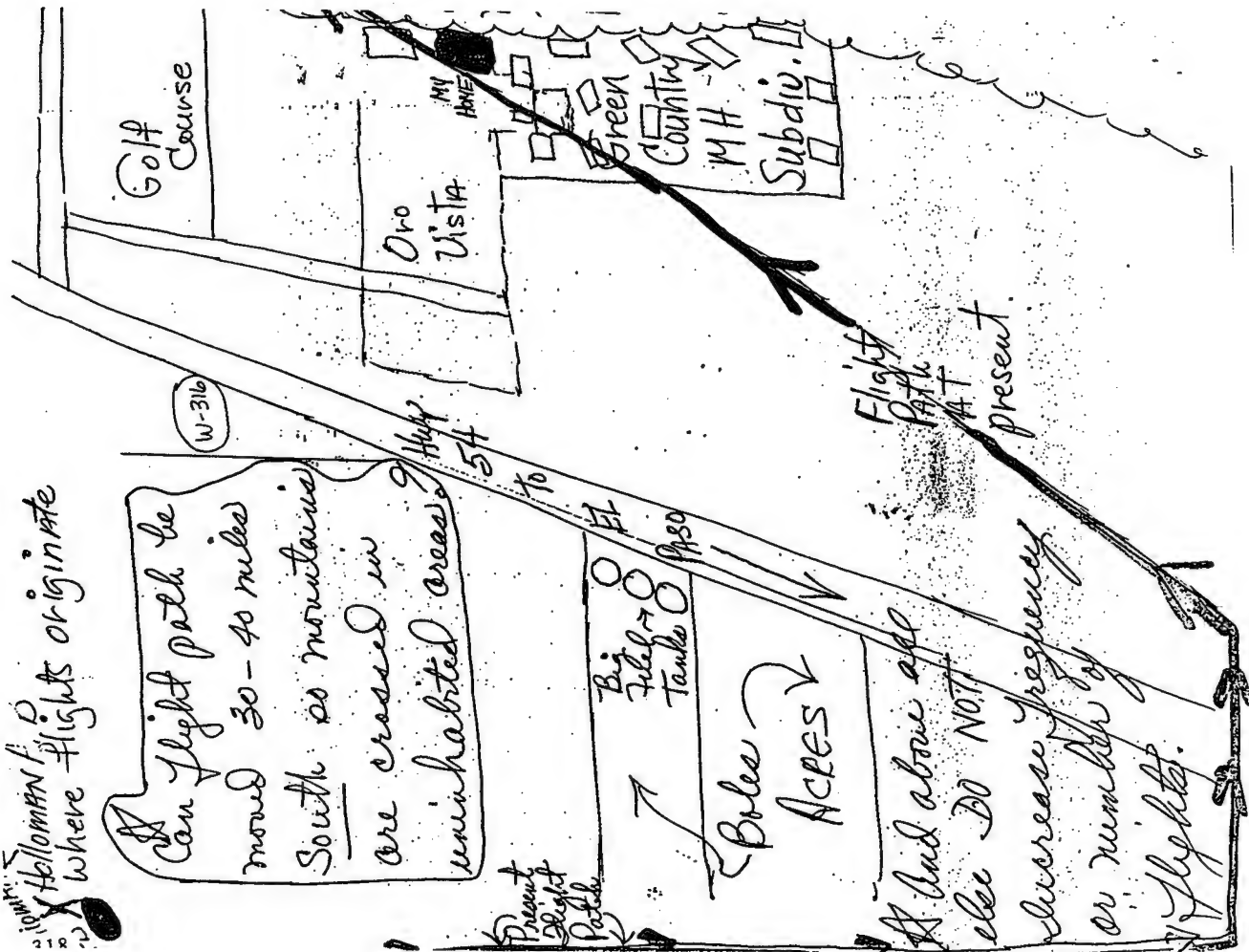
Cruces chamber backs Holloman expansion

The Las Cruces Chamber of Commerce recently announced it fully supports the expansion of German Air Force training at Holloman Air Force Base.

"The entire southern New Mexico area is very dependent upon the economic impact provided by facilities and personnel at Holloman Air Force Base, McGregor Range, and White Sands Missile Range," states a news release.

The expansion, the release continues, would not only add to that community's economic base, "but also significantly enhance this region's contribution to our own national defense and further promote international cooperation."

The Alamogordo Chamber of Commerce has launched a major initiative to support the expansion as well for similar reasons.



Peg Briney

Peg Briney
1406 Highland Road
Roswell NM 88201
505.623.1244

Aug 14, 1987

Sheryl Parker
EIS Project Manager
Div Com Bot Comm and
US Air Force Base (Langley)
129 Andrews Ave.
Langley, AFB Kingman 23665-2269

Ms Parker:

I thank you for the opportunity to review and
comment on the Draft EIS for the proposed
expansion of S.A.F. operations at Holloman AFB, NM.

The EIS is well written, good maps, good discussion.
EXCEPT! you don't go into details as to why WOM
praying flowers are annoying, rather than the seasonal
production of the base automatically being annoying
to a specific searching operation!

After contacting several agencies, I have learned
that this area is considered a "grass bank",
by the area ranchers - please to spray their
cattle when no other grass is available, then
allowing them to maintain their herds, i.e.
their livestock.

You do not tell us, or at least I could not find
a statement to the effect that the WOM is
one of the best places in NM to hunt deer,

Peg Briney
Box 88-440
Prescott, AZ
86315-0888

(2)

Great and strong horn.

W-335

Unfortunately, in most areas, no new land is
being formed, certainly not on WOM or NM, but
the population continues to increase. We are
all aware of the ^{RATS} rat in a maze, over crowding
which leads to stress, which leads to a social
and a anti social behavior. People wonder
if new, (in crowded conditions) need more areas
in which to overcome and to RE CREATE them selves.

A recent news cast over KNEW informed me that the
possible base for some of their fighters, the day I
contacted KNEW, was informed that the S.A.F. was
just looking at an active F16 base!

By the end of summer 1987-500 personnel will
be leaving Cannon AFB, which means base housing
is available. Less expensive as housing at
Cannon has recently been demolished, has the
Hospitals, and the commandery and the Officers Club.
Bills for furniture has even been replaced.

The Air Force and all Military need more areas
they now have more efficiency, i.e. as R.Ni,
M.D.s, M.R.s with all shifts, so much.

W-334

W-335

Peg Briny
BWS-1403
Pascata, AZ
80313-0222

Pilots and ground crews.

7 I would hope that the many military bases throughout the S.W. have been or will be studied so that better usage of each area will result.

7 Williams AFB, AZ is closed Base in TX is closed - Has the idea of Goldwater or Melrose Park being razed been studied - What about Ch. Nakate,

next to Phoenix, AZ?

7 I'm sure that involving foreign AF's to utilize the American AF's is grounded in economies, while the AF see a threat that one of the present NM bases be closed & WOM cannot be used? I am not so naive, I think this could not occur.

7 If a bombing range must be on the McGregor Range, the Tularosa Basin would be, (in my opinion) less detrimental to the Ranchos, Hunter and all who use public lands.

San Diego, Peg Briny
Director of Long IWLH
Member Public Lands Committee -

(3)

August 15, 1997

Sheryl Parker, Headquarters
Air Combat Command/CEVA
129 Andrews St.

Langley Air Force, Va. 23665-2769

So when it may concern:

My family has lived in Alamogordo, N.M. (near Holloman Air Force Base, N.M.) since 1978. Recently, we have been bothered greatly by low-flying air-craft over our home at 1809-23rd St. The most recent occurrence was this morning shortly before 12:00 AM and more now at 10:50 AM. We protest this very much - we will not tolerate the noise or the fear of a plane crash. As an ex-retirement age & we cannot do this if this will continue - if so, we will sell our home.

Sincerely,
Sheryl Parker
CEVA ELLERBORG
1809 23rd St.
Alamogordo, N.M. 88318

505-432-2342

August 18, 1997

Ms Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, Virginia 23665-2769

Dear Mr. Ms. Parker,

I am writing this letter out of concern for what Holloman Air Force Base in New Mexico is planning to do in regards to low-level training flights over the Trans-Pecos region of West Texas. I own vacation property and pay taxes in Jeff Davis County and I recently learned about these plans and the detrimental effects they would have on residents and visitors to the area. I base my objections on the following:

1. The Air Force deceived the public and the Environmental Protection Agency about the true effects of these flights (see enclosed documents). Their claim of "no significant impact" on the environment is both arbitrary and arrogant, with no consideration being given to evidence to the contrary.

2. These low-level flights, at only 100 feet above ground level and at speeds approaching the sound barrier, have already caused accidents and injuries to people and wildlife, and will be disastrous to the air quality, the eco-system, the economy, and the overall peace of the region.

3. The benefits received go entirely to the Air Force, U.S. allies who want to use the area for training, armaments builders and suppliers, and contractors who will profit from the multi-million dollar deals. The unfortunate persons who have to endure these flights will be asked to make all the sacrifices in terms of lost income, decline in property values, erosion of quality-of-life, etc. It has been suggested that we should be willing to do this because it is our "patriotic duty", but it should be observed that other localities, such as Germany, England, and the state of Virginia have already rejected this type of training and have refused to allow it. The Air Force wants this area as training for the next "oil war" in the Middle East. Perhaps it would be better to encourage our own domestic oil industry and not get pulled into

this volatile trap again.

4. These flights would violate private-property rights. By the Air Force's own admission in a public meeting held in Alpine, Texas the representative stated that the boundaries of a person's private property extended to include 500 feet above ground level. As mentioned, these flights would be only 100 feet above ground level. The Federal Government owns millions of acres of land in the west; let the military use this and not harass private citizens.

The items mentioned above represent the main areas of my concern. Please find enclosed more detailed accounts and studies of the human, animal and environmental impact on the Trans-Pecos region of Texas. The people of this remote and beautiful section of the state have already been forced to endure smog from Mexican coal-fired power plants, sewer sludge from New York City, and nuclear waste from other states. I realize that in a democracy a certain amount of shared sacrifice is required, but I consider the huge sacrifice that West Texans are being asked to make, with no perceptible recompense, grossly in excess to their duties as citizens.

W-336 I would respectfully ask that you consider my letter and the enclosed documents and use your influence to protect the rights of private property owners and prevent the spoilage of this part of West Texas.

Sincerely Yours,

Kenneth Largent

Legal And Ethical Brief No. 3836, August 1, 1997
 Formal Complaint Against The Below Listed United States Air Force Proposals

To Whom It May Concern:

**Subject: The Proposed Actions Of The United States Air Force, Air
 Combat Command Relative To Low-Level Flights In The
 Trans-Pecos Area Of Texas**

Proposals By The United States Air Force Are:

- (1) Proposal For Modification Of Air Space For
 Instrument Route IR-178, 1993
- (2) Proposed Airspace Modifications To Support Units
 At Holloman Air Force Base, NM, 1996
- (3) Proposed Expansion Of German Air Force Operations
 At Holloman AFB, New Mexico, 1997

Section I: Investigation by Analyzing and Investigating Group

Our investigation of the referenced documents, witnesses and de facto occurrences shows a progression of deteriorating environmental conditions of the Trans-Pecos Area (TPA) relative to the implementation of the Initial Environmental Assessment (EA) of 1993.

Projecting the compounding of the initial deteriorating source by implementation of the Environmental Assessment (EA) of 1996, through the Environmental Impact Statement, Draft, July, 1997 we find an increasingly deteriorating condition. The compounding of the volume of sorties along these routes in the TPA is to compound the deterioration of the environment.

Projecting the documented intentions of the United States Air Force, Combat Command, to the near future, accumulated evidence from the listed sources indicates a definite intent to compound the volume of sorties necessary to accomplish these training exercises. This compounding of training flights will end only with the establishment of a world-wide training facility dedicated to unknown years of activity and expansion. These actions will create immeasurable deterioration of the ecology and the environment of the TPA.

This Investigation and Analysis is based on the referenced documents, documented statements, claims and assumptions made by the United States

Air Force (USAF), Air Combat Command (ACC), contained in the above referenced proposals, and from personal, letter or telephone interviews with residents, guests, travelers, students, land owners and other citizens of the Trans-Pecos Area.

This group of citizens constitute a class action representation of citizens in the Trans-Pecos Area (TPA). The TPA covers the area west of the Pecos River, south of the New Mexico/Texas border and north of the Rio Grande River (Rio Bravo).

As of this date, our Investigation and Analysis Group has not obtained a copy of the Environmental Assessment, 1993, document.

Our investigation is based on interviews with residents of Sierra Blanca, Alpine and Fort Davis, Texas, ranchers, campers, tourists and visitors who have witnessed USAF flights at low levels along Instrument Route (IR) 178 as shown on the El Paso Sectional Aeronautical Chart, 58th Edition, February 27, 1997, and generally from citizens from the TPA. Unrecorded interviews and conversations with witnesses are classified as "hearsay evidence" and may, or may not, be true and correct. Letters and taped conversations with witnesses shall be deemed to be true and correct. (The truth as they know it.) No sworn oaths have been taken.

In 1993, the USAF, ACC, proposed to modify airspace to support USAF units located at Holloman Air Force Base (AFB), New Mexico. The proposed action was for the purpose of training USAF and German Air Force (GAF) units in low-level stealth maneuvers. In May of 1993, this action was assessed in an Environmental Assessment (EA) and a Finding of No Significant Impact completed in 1993. We assume this was the EA that lowered the minimum above ground level (AGL) to 100 feet for Instrument Route (IR) * 178 that is over Sierra Blanca and to the southeast. This training has been ongoing for some years.

In 1996, the USAF again proposed to modify airspace to support USAF and GAF units located at Holloman AFB, New Mexico. The proposed action was needed to meet expanded training requirements. Due to the progressive expansion of this training program, compensation was needed for increasingly limited access to White Sands Missile Range airspace. In May of 1996, 12 GAF Tornado aircraft were then stationed at Holloman AFB. As specific GAF Tornado mission-in-training plans were being prepared, they identified an additional requirement to perform long-range, low-level training flights (down to 100 feet AGL) as well as the need for low-altitude (down to 300 feet AGL) air-to-air combat training for both Tornado and F-4 aircrews training at Holloman AFB.

The GAF also identified additional need for air-to-air refueling at altitudes lower than currently available in the vicinity of Holloman AFB. This low-level refueling training would be as low as 1,000 feet AGL, and would be between two PA-200, or two F-4, fighter aircraft.

As a result of the above stated changes in requirements for this type training, the USAF proposed to lower the 500 foot minimum to 100 feet AGL.

Ignored by the authors of both the related EA's and the EIS, were the factors of these new altitudes and speeds relative to the ground level impact. The impact of these new altitudes of 100/300 feet AGL, 736 MPH aircraft speeds and 60 to 95 MPH winds must be assessed. These de facto long term conditions create an ALIEN ENVIRONMENT that is terminal for life forms on earth.

The USAF's EA determined these proposed actions are not expected to result in significant impacts to the natural or human environment. No significant impact on civil aviation is anticipated. These claims are a complete contradiction to known facts.

We assume anyone in a position of authority/responsibility in the USAF has a reasonable education, and a corresponding amount of experience, to differentiate between jet aircraft that take off, land and park at Holloman AFB, New Mexico, and the low-level flights over private property and private citizens in the Trans-Pecos Area of Texas. (Perhaps the lack of understanding comes from the fact these jet aircraft do not take off, land or park in Texas)

In lowering these Military Training Routes (MTR's) to 500 feet AGL minimum elevation, we claim the first mistake was made. This accommodation for the military was done at a time when the size and power of aircraft was increasing, along with the Noise and Pollution. Any changes made in the minimum elevation for these MTR's should have been higher.

To compound the mistake, the minimum elevation was next lowered to 100 feet AGL. The aircraft engines became larger and more powerful. All this power is, of course, translated into tons of jet fuel. The Noise and Pollution became progressively more damaging to the Environment, and hence to the Ecosystems.

None of the USAF's determinations of proposed actions have proven to be correct. For information concerning IR-176 over Sierra Blanca, write to or telephone Bill Addington, P.O. Box 218, Sierra Blanca, Texas, 79851, or call (915) 369-2541.

Section II: Analysis by Investigating and Analysis Group

These actions and these progressive proposals for expansion are a destructive and unreasonable intent. These are 45,000 to 60,000 pound air-

craft flying at 500 to 621 miles per hour (MPH) 100 to 300 feet AGL. This series of events creates a unique physical reaction of explosive sound and air movement that humans, animals and plant life are not naturally exposed to. This transformation of energy is a law of physics. It's a destructive force, both physically and mentally.

There is a tremendous amount of energy generated by the burning of jet fuel through one or more engines; generating 30,000 pounds thrust, converting this energy to a motion of mass, heat, noise, wind and polluting gasses and unburned jet fuel.

What has been created is a completely ALIEN ENVIRONMENT.

All this action is taking place 100 to 300 feet (or lower) AGL. In this 300 feet of space are life forms. There are birds in the air, plants and animals on the surface of the ground, and micro-environments under the surface. These life forms constitute ECOSYSTEMS.

None of these ECOSYSTEMS are compatible with this ALIEN ENVIRONMENT. These ecosystems contain HUMANS. Our investigation explains where this ALIEN ENVIRONMENT originated, and our analysis explains how it is created.

The originators of this series of unreasonable acts, known as facilities for a training program, have obviously never been at the ground level position of these equations in physics with a piece of machinery of this size, sound and velocity flying over their heads. Our analysis shows these ecosystems will be severely damaged, will either mutate or die in this ALIEN ENVIRONMENT.

Section III: Results of Investigation and Analysis; History

(1) The necessary components for this training, as we understand it, are: jet fighter/bomber aircraft that can perform the maneuvers necessary to fly over rough mountain terrain at a speed close to sonic, be able to maneuver down canyons, through small "cuts & saddles" and between hills, all to avoid Electronic or visual detection. Flying at the correct speed means "not being heard until the aircraft has passed any anti-aircraft guns or troops". Low to the ground helps block laser or radar detection by being in a canyon, valley or between two hills. Ask the home and business owners in Sunny Glen subdivision on the west side of Alpine, Texas about this.

(2) We now have the correct aircraft and the correct technology for the aircraft. Now, all we need is the correct geographical location. In the Environmental Impact Statement proposing the addition of 30 additional GAF fighters, there is a statement that relates to the geological and geographical structures desired: high, semi-arid mountains, fair weather, not too hot and not too cold and sparsely populated.

Prior to the initiation of this training program into the TPA, the natural conditions of the area were as follows:

- (1) There is a growing population of several thousand humans living in the area. Some are permanent residents, some are visitors, some come for business reasons, some are passing through.
- (2) We have a clean, healthy environment. It is also quiet.
- (3) We have long views and majestic scenery, unlike Pennsylvania, New York or California. In photographs of these places, you do not hear the noise or smell the pollution.
- (4) The Trans-Pecos Area of Texas is a vast expanse of open country relative to Pennsylvania, New York or California. So is New Mexico, Montana and other states and areas of the United States (US). At this time, there are thousands of people in this area. Our economy is small because we have few factories, shipping, financial centers or silicon valleys. This remote area is clean, and the people here are honest.

Section IV: Technical Analysis

The following are major parts of this complaint. We have used the available technical information published by the USAF in the 1993 EA, the 1996 EA and the 1997 EIS, to formulate the above and following opinions.

To qualify the proposals for this new training center, the USAF used the available environmental studies from the two EA's of 1993 and 1996, and the EIS of 1997, and applied them to an incorrect activity and place.

- (1) All data concerning noise and pollution are predicated on Airports, Airfields and Air Bases. The average population is not exposed to this type of noise or pollution. At any commercial Airport, we drive to it in our car, taxi cab, bus line or such. You may, or may not, hear large airliners taking off or landing. They are high above you, or take off going away from you, and aircraft noise you hear grows progressively louder, passes over and grows progressively quieter.

In the sound-proof Air Terminal, we hear no roar of jet engines. After boarding our flight, we are towed away from the gate, and turned in the correct direction. Or, if we load onto our flight up some stairs, we may hear one jet engine that is difficult to talk over. Once seated, doors closed, we hear and feel the jet engines increase power, and we start our taxiing run.

Within the Airliner, we can talk with no difficulty, may read, or gaze out the window. We get to the end of the runway, the pilot gives full throttle to the engines, and we start our take-off. The noise increases considerably, we smell nothing, we can still carry on a conversation and feel only a slight vi-

bration of the jet engines. There is still no adverse feelings, sounds, odors or sights.

- (2) But, stop the story here and THINK for a moment. The ground crew, on start up of the jet engines, were all wearing respirators, ear plugs, ear muffs, long sleeved jump-suits, gloves and caps. They were on the other side of the wall that screened us from the extreme noise and pollution.

- (3) In the Trans-Pecos Area, we have been forced, against our will and better judgement, to the wrong side of the wall. Have you ever seen motion pictures of what a Navy Aircraft Carrier is like when launching aircraft? There are Video Tapes of the sights and sounds, but not the odor, of Aircraft Carrier Operations. When a USAF jet aircraft flies over us at 552/621 MPH, 100 feet AGL with no warning, it's worse than being a member of the flight crew on an Aircraft Carrier as we have no special suit, no gloves, no ear plugs, no ear muffs and no respirator.

The situation can be simply explained: We are on the wrong side of the wall.

(1) Airspace Use And Management:

Lack of correct management by the authorities at Holloman AFB is demonstrated in the conduct of the pilots in training. There are numerous documented accounts of accidents caused by these low-level flights, loss of sleep, difficulty in caring for injured or sick people and the non-compliance of the USAF's stated policy that there would be "no flights over towns, residences or businesses". We are frequently used for "target practise" or markers for reference.

There is little possibility any of the citizens (victims) affected by these flights will be wearing, or have access to, protective devices equal to the pilots and ground crews of these aircraft.

(2) Noise:

Lack of correct USAF calculations of high noise levels on MTR's, especially on routes IR-178, IR-102/141 and IR-122/130, are a result of "Models" that are not applicable to the low-level training flights proposed by the USAF. To compound the mistake, these "Models" are weighted averages based on the incorrect air speeds and time frames.

There is a lack of relativity to the true and correct conditions relative to these low-level flights as they impact the people, animals and plants on the ground. This lack of understanding is clearly shown in the USAF's Figure 4.1-2, Page 4-7, Noise Exposure From A Single Overflight Of A PA-200 at 100 feet AGL. Compare this with the true and correct Noise Exposure showing the actual explosive noise existing, in conjunction with the gale force blast of

air in Figure 4.1-2, Page 4.7 as modified by the Investigation and Analysis Group.

The "Models", script and references to noise in this section, Page 4-5 through Page 4-47 and Appendix "C" do not relate to the noise factors, circumstances or scenarios created by flying MTR's at 100 feet AGL at speeds up to 621 MPH. In USAF Figure 4.1-2, Noise Exposure, note the values used in creating this Figure 4.1-2. There is the Model of the Aircraft, a time frame, a decibel quantity, but no speed factor.

Figure 4.1-2 also shows the standard limit of 125 decibels of noise allowed by the governing authorities who are the Department of Defense (War Department) and the Federal Aeronautics Administration.

In the Figure 4.1-2 created by the Analyzing Group, we have interpolated a speed factor of 736 MPH to a decibel quantity of 142 decibels. This speed of 736 MPH is approximately the speed of sound at an altitude of 5,400 feet Mean Sea Level (MSL). In Figure 4.1-2, the USAF uses a lower aircraft speed in order to meet the lower sound limit of 125 decibels. This variance in speed factors will effect the amount of noise. The lower the speed, the lower the noise.

See USAF Figure 4.1-2, Page 4-7, AS, 1996 and Analysis Group Modified Figure 4.1-2. Comparison will provide a reasonable picture of the true impact of these unannounced training flights.

(3) Land Use.

The basic approach to this category is this statement by the USAF: "However, relative increases in noise and potential overflights experienced in portions of west Texas would appreciably alter the natural quiet for scattered rural residents". This is true at the present time. In the near future, it will be more so.

The USAF has ignored the de facto use of the 10,000 plus square miles of private property to be used in these training exercises. There are court decisions in the past that have determined what constitutes trespass on private property from the air space above.

(4) Air Quality.

The lack of true and correct USAF calculations based on higher-than-published aircraft operating speeds and actual flying conditions has failed to show the true and correct extent of pollution along IR-178, IR-102/141 and IR-122/130, in west Texas as well as the remainder of the routes and ranges. The USAF does not publish in the EA, 1996 or the EIS, 1997, data that is possible to check. To avoid redundancy, relate the basic methodology used by the USAF in Section 4.2, Noise, to this exercise in claims concerning

Air Quality. The Charts, Figures, script and other engineering resolution do not apply to the low-level training flights over the MTR's in the TPA of Texas. In some instances, they do not apply to Holloman AFB operations.

(5) Biological Resources.

The basic statements in both USAF EA's and the EIS assume there will be no long-range impact on plants or animals, whereas there are areas now being impacted along IR-178, from the identical training flights that will take place on IR-102/141 and IR-122/130.

An unnatural, chronic disturbance of any wild animal is cause for it to leave the area. This action will partly depend on the availability of the proper food, ample clean water and shelter. There will definitely be a migration of mobile animals from under these MTR's. If they could, all domestic livestock would also leave, but they are generally fenced in.

Occasionally, they will not leave an area for any reason. The variables have to do, of course, with survival. In high and normal rainfall years, game herds will scatter. In normal and low rainfall years, they wouldn't leave unless very stressed. All animals respond to alien occurrences in different ways.

Hunting leases constitute a large proportion of income in today's Trans-Pecos Economic Environment. Some ranching operations could not exist without them. We have information relative to the years of low-altitude flights along IR-178 concerning the constructive, or destructive, impact, on Biological Resources. Contrary to the USAF's opinion, all biological life forms are damaged by these low-level flights. Jet fighters flying at 100 feet, or 300, or 500 feet is just too low for natural life forms to tolerate.

IR-102/141 passes over a herd of Elk located just west of the town of Marathon, Texas, south of the Glass Mountains. Low-level flights over the wide valley and mountains they range in will be damaging to this Elk herd program.

(6) Archaeological, Cultural And Historical Resources

We have had no response in writing from the Texas Historical Commission. The Commission has, however, shown an interest in our investigation and complaint, as they have received no response from the USAF to their request for information relative to these proposed additional flights.

(7) Water Resources

We have no knowledge of any impact concerning the water resources in New Mexico. We do have knowledge of impacts concerning windmills and

other water supplies in Texas. We have eyewitness accounts of windmill fans torn up by the high winds of jet aircraft deliberately flying as close as possible to them.

(8) Hazardous Materials and Waste Management

We are primarily concerned with the spilling of jet fuel and the known amounts of CO, NOx and Particulates.

(9) Socioeconomics:

There is no Social/Economic assessment made in any of these EA's or the EIS, concerning the Social/Economic Structure of the Trans-Pecos Area. The USAF consistently ignores the social structure, minority races and the economic status of the majority of the citizens of this area, in direct contradiction to:

- (1) Presidential Executive Order #12896, Environmental Justice, page 3-121, para. 3.9.8 and Figure 3.9-1, page 3-122
- (2) The fragile economic balance between an expanding economy versus a subsistence, or decreasing economy.

The economy of any Trade Area depends on the ratios of "new money" to subsistence income. At the present time, the Trans-Pecos Area is primarily an agricultural community, but with several incentive programs managed by a combination of the Texas Commerce Department, private donations in the Trans-Pecos Area and a newly established local organizations, we now have a growing trade area. This USAF training program is directly counter-productive to all our efforts. Detailed information of our accomplishments is available on request.

In order of cash-flow volume of "new money" into this Trade Area, the following are the known sources:

- A. Cattle, sheep, goat ranching, hunting/camping leases
- B. Sul Ross University, Texas University System
- C. Retirement population/new construction
- D. Welfare recipients
- E. Tourist Visitors
- F. Southern Pacific Railroad Employees
- G. State and Federal Employees
- H. Motion Picture Industry

The retirement and tourist economics have been on the rise the past 5 years. The motion picture industry has been steady for 8 years, and has

gained slightly in the past five years. For a while, there was a decrease in these three "new money" sources. It could have been the national economy, or it could have been the drought. We doubt it was related to USAF actions along the MTR's in the area. That will come later. The citizens of Alpine, one of the larger towns in the Trans-Pecos Area, (population 6,480) have just begun to be exposed to the low-level fly-overs. The citizens living in towns have yet to grasp the concept of the eventualities, with the exception of Sierra Blanca, Texas. Since 1982, there has been an equal growth of population in the outlying county areas, relative to growth of the town populations.

In Alpine, three motels have been built in the past three years. When interviewed, the managers informed us their studies indicated there would be an increase in occupancy from three sources: (1) The increase in enrollment at Sul Ross University brings more friend and family related visitors, and (2) the vacation overnight facilities at Big Bend National Park would not be expanded due to cuts in budget by the National Park Service (NPS), and the controversy over NPS service contractors, (3) There are more day hikers and day campers in the surrounding country side.

The ratio of "destination" vacationers to "transient" vacationers becomes closer each year since 1986.

Outside the towns, in the counties, private land owners are planning additional business enterprises. As an example, there is 718 more new construction in the county areas than in Alpine, Texas. Cattle, sheep, goat ranching, hunting/camping leases business enterprises have plans (hearsay evidence) to provide destination facilities for camping vacationers.

These camp grounds will be constructed in very beautiful, high altitude country. Initial plans are for a number of well-arranged campsites with electricity, potable water, rest rooms, showers and access to hiking and helping ranchers with their goat, cattle and horse operations (Dude Ranching). All this at a cool summer altitude of 4,400 to 6,400 feet AMSL. These are mostly small camp grounds for families.

There are also plans for apartment and office buildings in scattered, rural locations, but none will start construction until this low-level flying is stopped.

The present impact of low-level training flights by the USAF has been noticed by various tourists, hunters, campers and mostly by the private businesses related to outdoor activities as well as the ranching businesses and the ranch employees.

There is another tier of SocioEconomic Impact. With the progressive expansion of these sorties up to approximately 22,252 per year, 89 per day, the danger of highway accidents will increase, as will accidents to ranchers, ranch employees, hunters, hikers, campers and eventually to residents of the towns in the area.

(10) Transportation.

We have no comment on this section as it does not effect the Trans-Pecos Area.

(11) Utilities.

We have no comment on this section as it does not effect the Trans-Pecos Area.

(12) Soils.

We have no comment on this section other than a concern with these jet fighter aircraft blowing dirt in our eyes and down our shirts.

(13) Safety.

We can acknowledge the fine technical work involved by highly skilled mechanics, electricians and electronic experts that make up the ground crews of the USAF and GAF at Holloman. Our main concern is the ever present "human error" and the natural law of chaos. (See Murphy's Law).

This entire proposed training program of low-level training flights reminds us of a long ago conversation with then Colonel "Chuck" Yeager. He stated the average career percentage of mortality for fighter pilots in the USAF was 31.2%.

Until a year ago, the safety factors and documented accidents related to the citizens of the TPA show a small incidence of injury or death due to these low-level flights. Based on the past actions of the USAF fighter pilots, with the increased low-level training flights, there will be an upward progression of aircraft-related accidents among the citizens on the ground and in private aircraft.

A personal account of what we think were scouting flights from Holloman AFB by USAF jet aircraft prior to the presentation of the EA, 1996.

"In April of 1996 at about 1:30 pm while working on a flat-bed trailer at the barn, there occurred a sudden explosion, then a roar that diminished and became a fast moving jet aircraft. There was no warning. The noise made my ears ring, the gale force winds made me stagger, and I had dirt in my eyes. Fortunately, the barn broke up some of the noise energy and the wind.

"In May of 1996, at about 4:30 pm, while working in the open on some water-well controls, there was a slight buzzing sound for a split second, then another explosion of sound and air. There was no warning as this jet aircraft came directly over me. The combined energy and gale force winds knocked

me off my feet, blew dust, twigs and grass in eyes and nose, down my shirt and stung my face. Then the roar diminished as the jet fighter flew off. I picked myself up and pulled the thorns from my left hand. Then I got curious about the source and purpose of these jet aircraft.

"The third incident occurred three days later while I was walking toward the job-site to take measurements. This time, there was a split-second roar to a crescendo, a blast of sound, but no wind. This was a USAF jet fighter aircraft that passed about 250 feet to the east of me, close enough to the ground to stir up dust, whip the tops of juniper brush around, and then drop down out of sight through a cut in the hills into the lower elevations of the Alpine, Texas area. My property is 5,400 feet elevation MSL."

Our access to competent emergency treatment is Odessa, Texas, 3 hours and 15 minutes away. We have an emergency facility in Alpine, Texas, 20 minutes to 1 hour and 45 minutes away, that is staffed by technicians and nurses.

There are numerous accounts of citizens who have had frightening experiences with low-flying jet aircraft flying under 100 AGL. Incidences of flying at vehicles head-on over a high-speed highway; timing the vehicle to pass just in front of it at 50 feet AGL; chasing a motorcyclist on the highway and three jets playing with a vehicle on the highway to see who could get the closest have been reported to us. These MTR's cross state and federal highways thirteen times in the Trans-Pecos Area.

People have also been blown off ladders, blown off their feet and startled enough to drop objects and horses startled enough to throw their riders.

Cumulative Impacts:

(1) It is imperative for the EPA to conduct tests and experiments to determine what the true and correct impact of these low-level flights will have on all phases of the environment. At this time, we can discover NO BENEFITS from such UNREASONABLE ACTS, but find numerous destructive acts.

(2) It is possible for us to extract true and correct data from standard engineering books available in our libraries to contradict the USAF claims. We can only assume the calculations are mathematically correct. The base factors are what are not reasonable.

However, we have determined there is a direct responsibility for the USAF to include this information in its EA's and EIS's submitted to the EPA for review, and we should abstain from interfering with this process.

If necessary, we will publish engineering data from independent, public sources. These data show unreasonable differences in most of the USAF's claims and our claims. It is our opinion, based on the engineering data used to arrive at the published Airspace Use & Management, Noise, Air Quality, Safety and Socioeconomics, that none of these subjects have been correctly

addressed by the USAF. There is no assessment of the Social/Economics of the TPA per say.

(3) There is a progression to this series of USAF proposals that has as yet to reach its ultimate goal. The USAF has provided us with extensive information concerning the future of these training programs set out by the two EA's and the EIS.

The USAF started with a few fighter aircraft for special units (Wings) to become proficient in the type air warfare proposed to be taught with these programs based at Holloman AFB. There were objections exactly like ours to this training taking place at scattered USAF bases across the USA. There were efforts to do this type training in England and Germany, to no avail. The training programs were ejected from those countries.

The final progression, according to information received from the USAF, is to establish, maintain and operate a world class training facility for this low-altitude combat training to be shared, for a price, by all USA military air power, all North Atlantic Treaty Organizations and all other nations that choose to purchase our military aircraft, old or new.

The possibilities for destruction of the TPA ecology and environment are endless. There will be additional Military Training Routes (MTR's) established; then there will be a need for super-sonic training flights.

The pity of it all is the total lack of necessity for any of this. There is no logical explanation for this need. The USA is not at war. There is no national emergency. The only foreseeable wars are those the USA will initiate.

Harold Bryan Kelley

Harold Bryan Kelley, CPCM
Government Contract Law
P.O. Box 605
Alpine, Texas 79831

(915) 364-2323

FAX (915) 364-2299

Attachments:

Figure 4.1-2, page 4-7

Figure 4.1-2, page 4-7 amended

Figure A-1, page A-4

Consent Document August 1007

~~Consent Document August 1007~~

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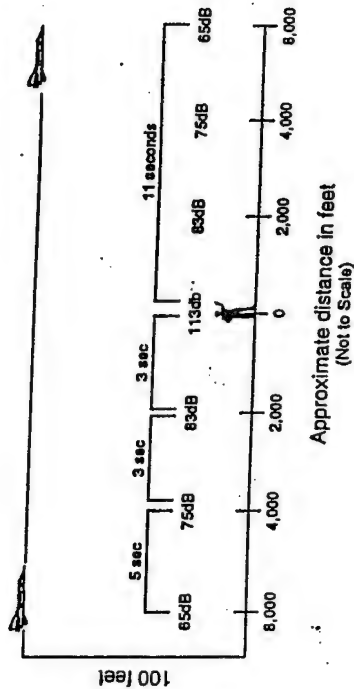
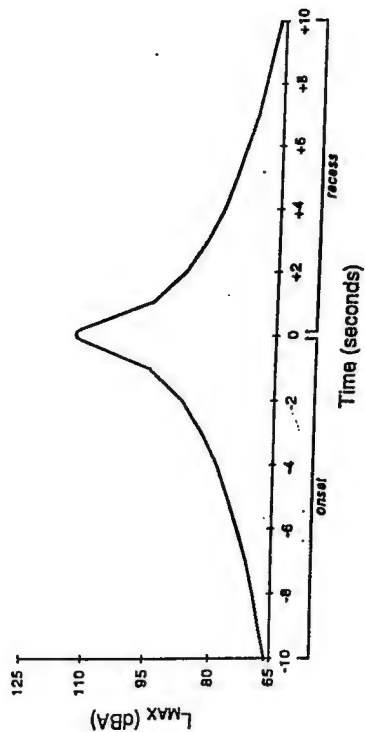


Figure 4.1-2 Noise Exposure from a Single Overflight of a PA-200 at 100 Feet AGL.

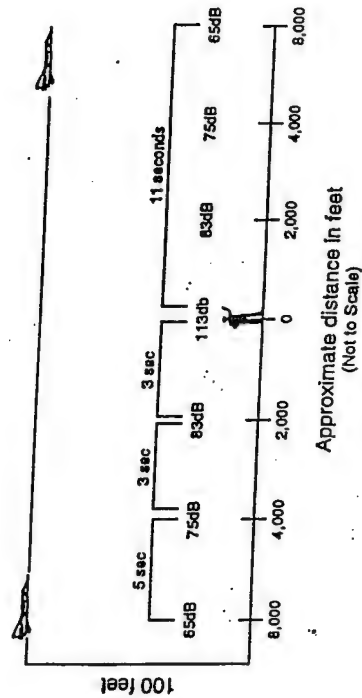
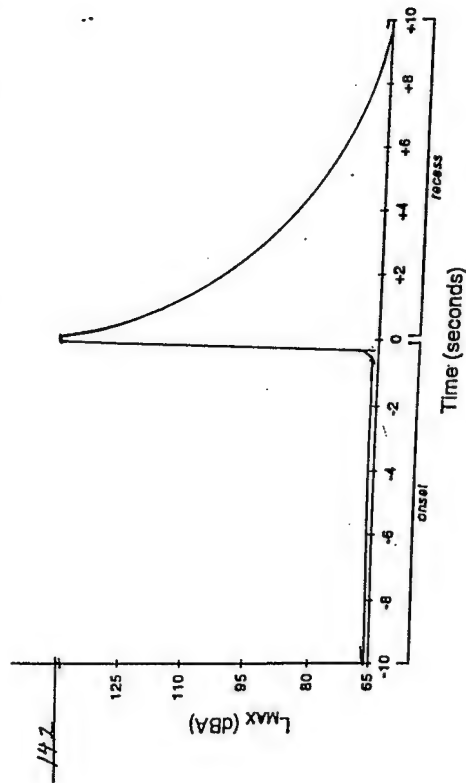
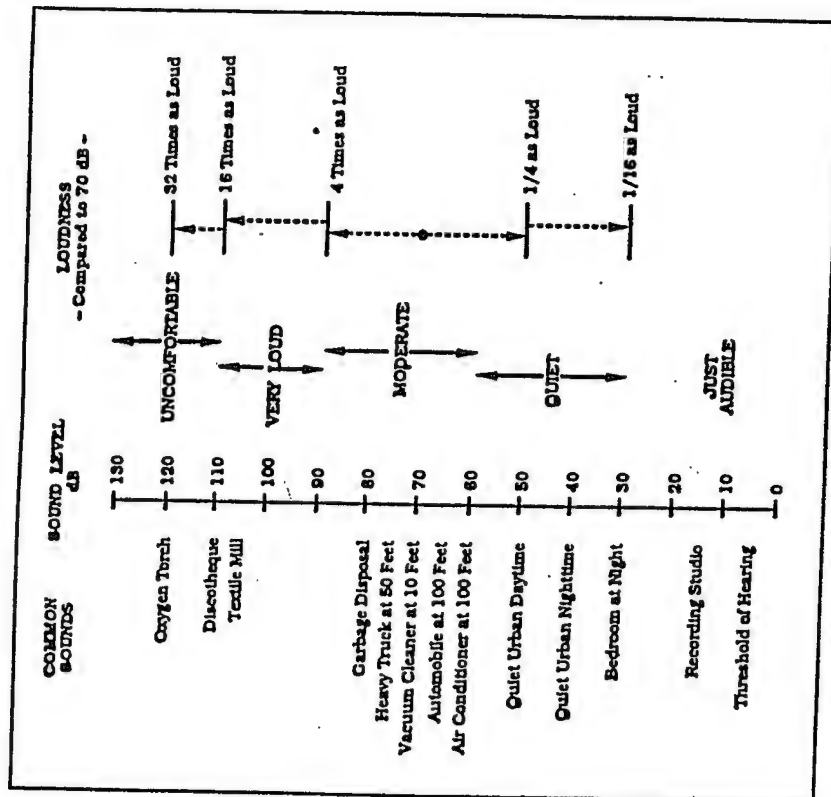


Figure 4.1-2 Noise Exposure from a Single Overflight of a PA-200 at 100 Feet AGL.

Figure A-1 Typical A-Weighted Sound Levels of Common Sounds.



Source: Handbook of Noise Control, C.M. Harris, Editor, McGraw-Hill Book Co., 1979

August 18, 1997

Ms Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, Virginia 23665-2769

Dear Mr. Ms. Parker,

I am writing this letter out of concern for what Holloman Air Force Base in New Mexico is planning to do in regards to low-level training flights over the Trans-Pecos region of West Texas. I own vacation property and pay taxes in Jeff Davis County and I recently learned about these plans and the detrimental effects they would have on residents and visitors to the area. I base my objections on the following:

1. The Air Force deceived the public and the Environmental Protection Agency about the true effects of these flights (see enclosed documents). Their claim of "no significant impact" on the environment is both arbitrary and arrogant, with no consideration being given to evidence to the contrary.
2. These low-level flights, at only 100 feet above ground level and at speeds approaching the sound barrier, have already caused accidents and injuries to people and wildlife, and will be disastrous to the air quality, the eco-system, the economy, and the overall peace of the region.
3. The benefits received go entirely to the Air Force, U.S. allies who want to use the area for training, armaments builders and suppliers, and contractors who will profit from the multi-million dollar deals. The unfortunate persons who have to endure these flights will be asked to make all the sacrifices in terms of lost income, decline in property values, erosion of quality-of-life, etc. It has been suggested that we should be willing to do this because it is our "patriotic duty", but it should be observed that other localities, such as Germany, England, and the state of Virginia have already rejected this type of training and have refused to allow it. The Air Force wants this area as training for the next "oil war" in the Middle East. Perhaps it would be better to encourage our own domestic oil industry and not get pulled into

this volatile trap again.

4. These flights would violate private-property rights. By the Air Force's own admission in a public meeting held in Alpine, Texas the representative stated that the boundaries of a person's private property extended to include 500 feet above ground level. As mentioned, these flights would be only 100 feet above ground level. The Federal Government owns millions of acres of land in the west; let the military use this and not harass private citizens.

The items mentioned above represent the main areas of my concern. Please find enclosed more detailed accounts and studies of the human, animal and environmental impact on the Trans-Pecos region of Texas. The people of this remote and beautiful section of the state have already been forced to endure smog from Mexican coal-fired power plants, sewer sludge from New York City, and nuclear waste from other states. I realize that in a democracy a certain amount of shared sacrifice is required, but I consider the huge sacrifice that West Texans are being asked to make, with no perceptible recompense, grossly in excess to their duties as citizens.

I would respectfully ask that you consider my letter and the enclosed documents and use your influence to protect the rights of private property owners and prevent the spoilage of this part of West Texas.

Sincerely Yours,
David W. Arnold
Betty J. Smith
P.O. Box 185
Crane, Texas
79731

August 18, 1997

Ms Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, Virginia 23665-2769

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3. The benefits received go entirely to the Air Force, U.S. allies who want to use the area for training, armaments builders and suppliers, and contractors who will profit from the multi-million dollar deals. The unfortunate persons who have to endure these flights will be asked to make all the sacrifices in terms of lost income, decline in property values, erosion of quality-of-life, etc. It has been suggested that we should be willing to do this because it is our "patriotic duty", but it should be observed that other localities, such as Germany, England, and the state of Virginia have already rejected this type of training and have refused to allow it. The Air Force wants this area as training for the next "oil war" in the Middle East. Perhaps it would be better to encourage our own domestic oil industry and not get pulled into

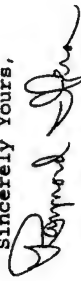
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The items mentioned above represent the main areas of my concern. Please find enclosed more detailed accounts and studies of the human, animal and environmental impact on the Trans-Pecos region of Texas. The people of this remote and beautiful section of the state have already been forced to endure smog from Mexican coal-fired power plants, sewer sludge from New York City, and nuclear waste from other states. I realize that in a democracy a certain amount of shared sacrifice is required, but I consider the huge sacrifice that West Texans are being asked to make, with no perceptible recompense, grossly in excess to their duties as citizens.

I would respectfully ask that you consider my letter and the enclosed documents and use your influence to protect the rights of private property owners and prevent the spoilage of this part of West Texas.

Sincerely Yours,



Raymond Ifera
P.O. Box 385
Crane, Tx. 79731
Ph. 915-558-2563

August 18, 1997

Ms Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, Virginia 23665-2769

Dear Mr. Ms. Parker,

I am writing this letter out of concern for what Holloman Air Force Base in New Mexico is planning to do in regards to low-level training flights over the Trans-Pecos region of West Texas. I own vacation property and pay taxes in Jeff Davis County and I recently learned about these plans and the detrimental effects they would have on residents and visitors to the area. I base my objections on the following:

1. The Air Force deceived the public and the Environmental Protection Agency about the true effects of these flights (see enclosed documents). Their claim of "no significant impact" on the environment is both arbitrary and arrogant, with no consideration being given to evidence to the contrary.
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Sincerely Yours,

David Griffin

August 18, 1997

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Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, Virginia 23665-2769

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Sincerely Yours,

Anton T Carrall
Sibyl Carrall

Box 302
Cruane, Texas 79731
915-558-2186



TEXAS HISTORICAL COMMISSION

George W. Bush • Governor
John L. Nau III • Chairman
Curtis Tunnell • Executive Director

The State Agency for Historic Preservation

18 August 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

Re: *Proposed Expansion of German Air Force Operations at Holloman AFB, NM*
Brewster, Culberson, Hudspeth, Jeff Davis, Pecos and Presidio Co. (Air Force, D2)

Dear Ms. Parker:

The Texas State Historic Preservation Office (SHPO), our agency, reviews federal undertakings referenced under Section 106 of the National Historic Preservation Act of 1966, 36 CFR 800. The Division of Antiquities Protection reviews projects to determine their significance and impact to archeological properties. The National Register Programs reviews projects to determine their eligibility for listing in the National Register of Historic Places and the Division of Architecture reviews projects to determine potential impact to historic properties.

We are in receipt of a formal complaint filed by Harold Bryant Kelly, Alpine, Texas, regarding the addition of sorties from the German Air Force (GAF) through the Trans-Pecos Area of Texas. While we can not address issues relative to invasion and disruption of privacy, we do have concerns for claims that sorties traveling through the Trans-Pecos Area are 142dB which may potentially cause damage to historic properties under the flight path. Previous correspondence with Science Applications International Corporation showed that sound lower than that 130db does not affect building components and that sounds produced by the sorties would not exceed 110db. Please clear up disputed sound levels.

For questions about eligibility concerning buildings, structures, objects, or districts, contact Greg Smith, National Register Department, 512/463-6006. For questions about effect to buildings, structures, objects, or districts contact Hugo Gardea, Department of Architecture, 512/305-9109. Thank you for your interest in the cultural heritage of Texas and for your compliance with this federal review process.

Sincerely,

hugo a. gardea

Stanley O. Gardea, DSHPO
Department of Architecture

cc: Dr. Lynn Sebastian, New Mexico State Historic Preservation Officer
Mr. Frank Daugherty, Brewster County Historical Commission
Mr. Harold Bryan Kelly, Alpine

HG/TX counties
TR noise 081897

August 19, 1997

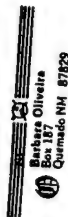
To Whom it May Concern:

Please stop the German
Tornado flights on WE-176.

Barbara Oliveira

Box 187

Durham, N.H. 03829



Ms. Cheryl K. Parker
HQ ACE/CEVA
129 Andrews Street
Suite 102

Langley Air Force Base, VA
23065-279

Mr. & Mrs. B. J. Carrejo
HCR 62 Box 6706
Reserve, NM 87830-9602

Aug 19, 1997

We are very much against letting

German Air Force use our area for

low level training flights.

We are senior citizens and have lived
in this quite area all our lives.

This would be a big interruption in
our daily life.

Sincerely

Mrs. B.J. Carrejo



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Post Office Box 649
Albuquerque, New Mexico 87103

IN REPLY, PLEASE REFER TO:

August 26, 1997

VIA OVERNIGHT FEDERAL EXPRESS

ER 970451

Sheryl Parker
Headquarters Air Combat Command/CEVP
United States Air Force
11817 Canon Boulevard
Crestar Bank Building, Suite 213
Newport News, Virginia 23606-2558

Dear Ms. Parker:

The U.S. Department of the Interior has received and reviewed the Draft Environmental Impact Statement (DEIS) for Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico, June, 1997. In this regard, the following comments are provided for your consideration and use during development of further environmental documentation.

GENERAL COMMENTS

Bureau of Land Management (BLM) representatives have attended several scoping meetings covering the proposal to bring an additional 30 Tornado aircraft to Holloman Air Force Base (HAFB), develop a bombing range on the McGregor Range, and increase use of airspace in the region. Oral comments were offered by the Las Cruces District Manager, at the August 5, 1996, scoping meeting at Alamogordo and by the Mimbres Resource Area Manager, at the August 9, 1997, scoping meeting at Las Cruces. At these meetings it was stated and the reasons explained why BLM does not favor the development of a new bombing range on withdrawn public land on the Otero Mesa portion of McGregor Range, especially in light of the fact that other viable, less deleterious options are available. It is our opinion that various branches of the military do not, but should coordinate to better use and share existing bombing ranges and airspace.

Representatives from the Air Force have advised us that use of the Red Rio and Oscura Bombing Ranges on White Sands Missile Range has been made increasingly difficult due to air space access control by the White Sands Missile Range. We have suggested that Red Rio and Oscura could be more fully utilized if the German Air Force would train on weekends and not limit themselves to training only during weekdays. However, the alternative to more fully make

use of the existing ranges by incorporating weekend use was not covered in the DEIS. This alternative should be addressed and fully analyzed in subsequent environmental documentation. We do not feel the rationale that the German Air Force does not want to work on weekends is sufficient justification for not fully exploring this alternative. The omission of this alternative must be corrected in the final EIS.

As stated above throughout the scoping period, including meetings between Air Force officers, BLM, and County Government officials, the Air Force was asked to analyze the relief to scheduling problems and resultant operational enhancement of the Tularosa Basin and existing bombing range proposals by utilizing the existing Red Rio, Oscura, and Melrose Bombing Ranges on Saturday and Sunday and shifting days off to some period between Monday and Friday. This request came about when the Air Force advised meeting attendees of scheduling difficulties Monday through Friday at existing bombing ranges and that these ranges were not normally used on Saturdays and Sundays because pilots are traditionally given these days off. The Air Force advised BLM that the weekend scheduling option would be analyzed across the proposed action and alternatives and documented in the EIS. We find this to be a critical consideration due to the severe implications of not fully utilizing existing assets such as Red Rio, Oscura, and Melrose Ranges. The most significant implication is that unnecessary, deleterious construction and use of a bombing range on Otero Mesa is being considered.

If additional utilization of the Red Rio and Oscura Ranges does not fully meet HAFB's needs, we urge HAFB to examine the Tularosa Basin option as the location for the proposed bombing range. This site has already been impacted in the past by military ordnance and operations and the environmental impacts are much less than would occur on the Otero Mesa and Mountain Foothills site. We are concerned about the proposals, especially a bombing range on the Otero Mesa, due to adverse impacts to public access, use, and enjoyment (both economic and esthetic) of public land and resources. There would also be many and deleterious impacts to the customs and culture of the community dependant on the Otero Mesa and Mountain-Foothills portion of the McGregor Range that must be fully analyzed. Impacts to the existing level of access concern the BLM and the public dependant on that access for their businesses, including ranching, community economies, and historic and customary resource uses, including hunting, hiking, camping, plant and animal viewing (watchable wildlife), and enjoyment of the Black Grama Area of Critical Environmental Concern (ACEC) and the Culp Canyon Wilderness Study Area (WSA); New Mexico's premier antelope and deer herds use the mesa and mountain-foothills.

We believe HAFB is fragmenting the National Environmental Policy Act (NEPA) process by introducing new air and ground use in a piecemeal fashion. For example, on June 9, 1997, the Air Force released a final environmental assessment (EA) on 'Proposed Airspace Modifications To Support Units At Holloman Air Force Base, New Mexico'. The EA addresses the need to realign airspace to meet training flight requirements at HAFB for 12 German Tornado aircraft and expanded use of airspace, including low level flights down to 100 feet above ground level. We are concerned with the amount of low level traffic being proposed through various and separate projects. We do not know what the relationship is between the proposal presented in the June 9th EA and the proposal covered by the Bombing Range EIS. The cumulative impacts of your actions created by both air and ground use have not been fully analyzed.

The DEIS states that use of the Otero Mesa or Tularosa Basin Bombing Range sites would be "consistent with the long-term use of McGregor Range for military activities and would not increase the amount of lands under military use". The withdrawal terminates in four years in 2001. Long term use of the Range is only now being considered through the Fort Bliss Mission and Master Plan Environmental Impact Statement (MMPEIS) and will be considered in the upcoming Fort Bliss Withdrawal Environmental Impact Statement (WEIS). BLM has asked that both Fort Bliss EIS efforts and the Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico-EIS (including the bombing range proposals) address the non-withdrawal of the Otero Mesa and Mountain Foothills portion of the McGregor Range.

WJ-341

An increasing number of military training routes (MTR) and military operation areas (MOA) and an increasing number of military aircraft flying low-level training missions may at some point create a significant impact on wildlife in New Mexico. To date, no NEPA analysis concerning this type of activity has addressed the incremental increases in such low-level military flights.

Instead, each EA or EIS adopts a "piecemeal" approach, restricting the analysis to the immediate project and assumes that an adequate analysis of existing MTR's and MOA's was completed in previous NEPA documents. This piecemeal approach may obscure the issue of increasing low-level flights over larger areas each year. Since much of the southwestern United States is covered by a variety of MOA's and MTR's, the potential for aircraft disturbance of wildlife is broad and the scope of the analysis should also be broad to effectively address this issue. The simple conclusion that additional impacts are low is not adequate.

WJ-342

The proposed expansion of the German Air Force operations at HAFB will create higher levels of disturbance, both on the ground and in the air during periods when numerous wildlife species, including species listed under the Endangered Species Act (ESA), are nesting or while offspring are young and sensitive to disturbance. The three proposed training options will involve continued and/or increased use of MTR's. These low-level flights (particularly within VR 176) could adversely affect several threatened and endangered species that occur in the underlying airspace. To ensure that the proposed low-level flights do not impact wildlife, the prudent and responsible action is to avoid areas that support sensitive wildlife. Implementation of either of the new target complex (NTC) options could also adversely affect wildlife through changes in munitions delivery, bird-aircraft strikes, changes in noise levels, and changes in frequency of overflights. Of the bombing range options considered, we have the least number of concerns with the Tularosa Basin NTC. The Otero Mesa NTC is the most objectionable. It will increase impacts to previously undisturbed desert grasslands and potential aplomado falcon habitat considered important for the recovery of the species. The existing bombing range option, while preferable from a ground disturbance standpoint, will double the use of VR 176 and increase adverse impacts to known occupied habitat of several threatened and endangered species.

WJ-343

The Air Force has been informally consulting with the U.S. Fish and Wildlife Service (FWS) regarding the proposed action. FWS personnel have met on several occasions with Air Force personnel and the contractor preparing the EIS to discuss issues and potential mitigation measures for portions of the proposed airspace that may impact threatened and endangered species and/or their habitat. However, the Draft EIS does not reflect the issues and concerns identified by the FWS. In general, sensitive wildlife areas have been identified, but no mitigation or protective measures (avoidance areas, seasonal restrictions, etc.) have been incorporated into the document to minimize/reduce those potential impacts. Simply stating that "if selected, the

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WJ-345

proposed action would not be implemented until consultation with the USFWS has been completed" (page 2-67) is not adequate. It is inappropriate to conclude that the proposed action will have no significant impacts prior to completion of the ESA Section 7 consultation. The proposed action has the potential to impact several threatened and endangered species, over a large part of New Mexico and parts of Arizona and Texas; therefore, we recommend that the Air Force immediately initiate formal Section 7 consultation. Measures necessary to reduce impacts to threatened and endangered species identified through the consultation process should be incorporated into the EIS as required mitigation measures. In addition, given the number of ACECs, WSAs, State and Federal wildlife refuges, National Forests, National monuments, Federally-administered public lands, and other potentially sensitive wildlife areas, we do not agree with the determination that impacts to areas underlying MTR and MOA airspace would be insignificant, particularly since mitigation or avoidance measures and cumulative impacts are not identified in the Draft EIS.

WJ-345

WJ-346

WJ-347

We strongly disagree with the evaluation/interpretation of impacts to biological resources based on the definitions provided in Table 4.5-1 on page 4-68, particularly as they relate to impacts on threatened and endangered species. Based on these definitions of negligible, low, moderate, and high impacts, it is understandable how the Draft EIS erroneously infers no significant impacts for all biological resources; however, we do not agree with these analyses. Based on these definitions, the Draft EIS also erroneously infers that impacts from overflights, noise disturbance, bird-aircraft strikes, and habitat loss, would be low. This analysis allows for direct mortality and/or harassment of some individual wildlife species (including listed species). We do not consider activities that result in direct mortality and/or harassment ("take" under the Endangered Species Act) low impact activities. Use of these definitions in the Draft EIS inappropriately minimizes the impacts of the proposed action on biological resources, including federally listed species. An unbiased assessment of potential impacts to these species must be provided.

WJ-348

In addition, it is our opinion that the hearings process for this DEIS was seriously flawed in that a public hearing should have been held in Las Cruces, NM. A significant amount of interest in the bombing range proposal exists in Las Cruces, and opportunities for meaningful public participation and additional comment may have been foregone.

WJ-349

SPECIFIC COMMENTS

The DEIS fails to describe or analyze the impacts of the use of minerals. Chapter 3 should, at a minimum, describe the presence of feasible, locatable, and saleable minerals of economic importance. Chapter 4 should provide an analysis of impacts of continued or expanded military uses that could affect future exploration and development of those minerals. In addition, the DEIS does not but should describe the impacts of increased mineral use, especially sand and gravel, to support construction activities for the project. The BLM administers a large portion of mineral resources in the planning area and should be consulted regarding their availability.

WJ-350

Page ES-4, Land Use - Please state that the west Otero Mesa and Tularosa Basin sites proposed for construction and use of a bombing range are located on public land administered by BLM under a term withdrawal that expires in the year 2001.

WJ-351

Page ES-4, Land Use - The Otero Mesa and Mountain Foothills portion of the McGregor Range Withdrawal have been identified for non-renewal by the BLM. The BLM has requested in writing that non-renewal of the Otero Mesa and the Mountain Foothills be included as a proposal in the ongoing Fort Bliss MMP/EIS. The BLM will also make this request to Fort Bliss when the McGregor Range WEIS is initiated in the fall of 1997. Therefore, it is most appropriate that long term allocation of military uses on the Otero Mesa and Mountain Foothills be addressed in the MMP/EIS and the WEIS. In accordance with Public Law 99-606, the draft WEIS is to be completed by November 1998. Consideration and a decision for construction and use of a bombing range on Otero Mesa prior to completion of the MMP/EIS and WEIS is premature, fragments the NEPA process, and will prejudice the decision making process for both the MMP/EIS and WEIS.

WJ-352

Page ES-4, 3rd Paragraph - The DEIS states that under the Proposed Action the Otero Mesa south of Highway 506 would be closed 60 hours per week. This appears to be essentially an all day closure. The specific days and hours of closure must be disclosed. Additionally, the cumulative closure to public access and use of the Otero Mesa and Mountain Foothills portion of the McGregor Range due to all Department of Defense (DOD) and foreign military uses should be discussed and analyzed. The analysis should provide information on access restrictions that will be required for the first few years of the project and it should describe the cumulative amount of closure due to foreseeable development over a 20-year period.

WJ-353

WJ-354

Page ES-4, 4th Paragraph - It is unclear why use of the Tularosa Basin site would cause limitations of use within the grazing units on Otero Mesa. These limitations of use should be elucidated.

WJ-355

Page ES-4, 4th Paragraph - The DEIS correctly states that the Tularosa Basin site for the proposed bombing range is within the existing impact area and that the area is not generally suitable for public use due to Army's use. The Army has deferred clean-up of unexploded ordnance (UXO) where ordnance has been used in the Tularosa Basin portion of McGregor Range; therefore, the site may be hazardous. Please also include that the Otero Mesa Site has not yet been contaminated by UXO. We are concerned that long term avoidance and deferment of UXO clean-up by one branch of the Department of Defense (DOD) is a criteria for significant disturbance of natural resources and the displacement of public access and use in an area that is presently uncontaminated.

WJ-356

WJ-357

Pages ES-5 and 6, Biological Resources - We strongly take issue with the statement that "In no instance would the proposed action be expected to result in a significant adverse impact to biological resources." This statement was obviously made without the benefit of adequate primary, secondary or cumulative analyses of adverse impacts to these resources. Flat blading eight square miles is a large impact to the Mesa grassland community. In addition, we disagree with the statement that the area is not unique. This area represents some of the best desert grasslands in New Mexico. The historic conversion of large acreages of desert grassland to desert scrub make any remaining grasslands quite unique. The DEIS states that habitat for the aplomado falcon and other species is of lower quality and quantity compared to habitat on other portions of Otero Mesa. Habitat on Otero Mesa may be extremely important for the continued existence of the aplomado falcon and other species; this should be recognized in future environmental documentation. The BLM has initiated a 5-year study to determine habitat requirements of the aplomado falcon. Vegetative types, such as those found on the Otero Mesa,

may be found to be important for the continued existence of the aplomado falcon. The DEIS states that 150 acres of aplomado falcon habitat would be lost due to the Otero Mesa site.

WJ-360 Construction and use of a bombing range on the Otero Mesa could result in continued habitat loss and fragmentation far beyond the 150 acres, causing significant adverse impacts to aplomado falcon habitat needed for recovery.

WJ-361 Page ES-9, Socioeconomics - It is our opinion that the DEIS does not adequately address rural socioeconomics or the impacts to traditional historic uses of the landscape. These impacts should be fully analyzed and elucidated in Section 4.9.

WJ-362 Page 2-61, Table 2.4-1 - If overflights occur and/or increase over occupied threatened and endangered species habitat, we do not agree that impacts of the proposed action are negligible to low (see general comments above).

WJ-363 Page 2-67 - Section 7 consultation results and opinion should be completed prior to issuing the Record Of Decision (ROD) on this project, thereby, allowing any necessary mitigation to be included in the EIS process.

WJ-364 Page 3-30, 2nd Paragraph - In addition to grazing, oil and gas development is a large land use activity in southeastern New Mexico. Also, BLM does not manage hunting, per se; this is handled by the New Mexico Department of Game and Fish (NMDGF). BLM manages the recreational aspects of hunting activities. We suggest you reword the 2nd sentence as: Activities managed by the BLM include: grazing, mineral exploration and development (leasable, locatable, and saleable minerals), realty, cultural resources conservation, wildlife habitat and endangered species conservation, and recreation.

WJ-365

WJ-366 Page 3-30, 4th Paragraph - The listed ACECs are currently proposed. The DEIS also neglects to include the Alkali Lakes ACEC (proposed for biological resources), and the Sacramento Escarpment ACEC (existing and proposed for expansion for scenic and biological resources). The Wind, Cornudas, and Alamo Mountains proposed ACECs also recognize biologic resources values.

WJ-367 Page 3-33, Paragraph 2, Sentence 6 - The sentence incorrectly states that "The Army maintains management of soil, water, air resources, real estate, vegetation, and cultural resources." Pursuant to PL 99-606, the BLM is responsible for management of these resources in accordance with the Federal Land Policy and Management Act on the withdrawn public land on the McGregor Range.

WJ-368 Page 3-36, Paragraph 1 - Correct spelling of Craeger to Creager.

WJ-369 Page 3-37, Paragraph 2 - Please add that grazing contract fees are also affected by the existence and severity of local and regional reductions in forage production due to drought, the supply of alternative pasture land, and cattle prices.

WJ-370 Page 3-37, Paragraph 2 - Correct spelling to Christensen.

WJ-371 Page 3-37, Paragraph 4 - It should be recognized that most of the livestock are brought onto the range in the fall and removed in the spring and early summer.

Page 3-37, Paragraph 4 - The Foothills are defined as Grazing Units 3, 4, 5 and portions of 7 and 8. As a baseline, the DEIS should identify the dates and times closures took place in 1996. Most of the closures in the grazing units are from August through the middle of December in a normal year. These closures are normally two days out of the week. There is also the one week closure during Roving Sands in April/May.

Page 3-38, Paragraph 1 - It should be recognized that access to deer hunting on the southern end of the Lincoln National Forest has been routinely interrupted due to Fort Bliss scheduling, even though New Mexico hunting schedules are available to Fort Bliss for scheduling coordination. In 1997, a Japanese missile launch has been scheduled for the first and third day of a three day hunt with day two of the hunt as an alternate launch, with a resultant loss of access via Grapevine Canyon. This adverse impact should also be discussed.

Page 3-38, Paragraph 2 - The four existing ACECs on McGregor Range are not closed to public access by the BLM. The cooperative agreement regarding the Black Gramma Grassland ACEC is between BLM, New Mexico State University, and Fort Bliss. This agreement recognizes these areas for their value to ongoing research projects on desert grasslands.

Page 3-79, Paragraph 3 - This entire paragraph is misleading. The Range Site Guides for Major Land Resource Area (MLRA) number A-42, provides the potential composition by weight, total production, and various cover measurements for specific range sites at ecological potential on the McGregor Range. Recordation and display of data not correlated to range sites and associated soil types within a MLRA is misleading and meaningless.

Page 3-82, Paragraph 1 - The mule deer population on the northern portion of McGregor Range has historically been one of the best in the State in terms of numbers of animals and as a recreation resource. Previously, densities were estimated to be as high as 25 animals per section; current estimates are approximately 15-20 animals per section. The current decline of the population is likely due to many factors including poaching and predation influenced by several years of drought conditions. This paragraph should be revised to reflect this information.

Also, the pronghorn population on the Mesa Grasslands both on and off of McGregor Range is one of the best in the State in terms of the quality (size) of animals, number of animals, and the recreation resource. Management efforts by BLM and NMDF have brought this herd up to its current population of approximately 1,500 animals from a low of approximately 95 animals in the late 1970's.

Pages 3-89 to 92 - The DEIS does not discuss cultural resources at a landscape level, therefore, cumulative impacts to cultural resources cannot be addressed and indeed are not assessed adequately in this DEIS. The DEIS only addresses the impacts of surface disturbance and does not address the impacts presented by restricting access to a large buffer area.

These issues are of particular concern for the Otero Mesa proposal. The BLM has approached the McGregor Range, particularly the Otero Mesa, as part of an historic landscape potentially eligible for the National Register of Historic Places (NRHP) under criterion B (36 CFR 60.4) due to the association with Oliver Lee, and criterion D (36 CFR 60.4) for its overall data potential about the historic settlement period. Individual components-fence, pipelines, etc.-in and of themselves may or may not be eligible to the NRHP. However, they may each contribute

to the eligibility of this historic landscape to the NRHP. The New Mexico State Historic Preservation Office (SHPO) has repeatedly concurred with this approach.

Specifically, the DEIS does not mention Oliver Lee in section 3.6.1, yet this individual had an incredible influence on the politics of New Mexico and settlement of the area. Between his various ranch holdings, his ranch once encompassed an expanse from the Sacramento Mountains to the Texas-New Mexico border. His Circle Cross Ranch alone consisted of over 1 million acres, and ran from the mid-Tularosa Basin to the Cornudas Mountains of Otero Mesa. In addition to being a figure of State-level political prominence, he directly influenced the development of the Tularosa Basin and Otero Mesa due to his total control over the waters of the area. His ranch infrastructure was the framework for all subsequent settlement phases and land uses. Every phase of settlement from the homestead era, through withdrawal of the McGregor Range to the Army, to current use of the Mesa as BLM grazing units, follows a landscape pattern that was established by Oliver Lee. This information should be recognized in the DEIS.

In addition, the DEIS description of the historic period is quite abbreviated. No historical description is provided for the years beyond 1900 other than a brief description of the formation of HAFB. This is not sufficient. The DEIS does not adequately describe the existing environment for cultural resources, at least for the Otero Mesa on McGregor Range. It does not adequately address the direct or cumulative impacts of the proposed action on the historic resources of Otero Mesa. The BLM is concerned that establishment of a bombing range on the Otero Mesa will result in unavoidable impacts to public access, use, and enjoyment of these historic resources. It will directly impact the public's ability to continue their historic and customary uses, thereby terminating all "living history" activities on the Otero Mesa. In summary, a bombing range on the Otero Mesa will directly impact the potential to learn from, and to interpret to the public, the NRHP-eligible historic landscape on Otero Mesa.

Page 3-100, Paragraph 4 - On the west Otero Mesa proposal area, there are four water storages and five drinking troughs. The pipeline that runs through the target complex is a 2 1/2-inch PVC line. The pipeline that runs from Mesa Horse Camp to Mare Pasture Storage, which is on the eastern edge of the proposed target complex, is a 2-inch steel line. The pipeline running southeast of the target complex, from Mare Pasture Storage to End of the Line is a 2-inch PVC line necked down to a 1 1/2-inch PVC line. The two large storages, on the western edge of the target complex, have a 110,000-gallon capacity. The two smaller storages in the central portion of the target complex have a 3,000-gallon capacity and the storage next to the brick pumphouse has a 90,000-gallon capacity. These facilities should be so recognized.

Page 3-108, Socioeconomics - A description of the social structure of the rural area surrounding the McGregor Range, including the traditional historic uses of the landscape should be included in the DEIS. The BLM recognizes a great deal of interest regarding social structure and traditional historic uses of public land, as well as the impacts to adjoining uses due to management actions on public land.

Pages 3-125 to 129 - This section in general neglects to describe the existing State, county, and BLM roadways and the baseline use levels within the proposal area, specifically State Highway 506, Otero County Roads, and BLM access roads on McGregor Range.

WJ-385 Page 3-133, Paragraph 5 - The 5th sentence states, "Potable water requirements at HAFB are expected to equal 2.14 mgd in FY 00". However Page 4-109, 4th paragraph, 4th sentence states: "Baseline water consumption in FY 00 would increase from 2.14 to 2.30 mgd". It is our opinion that the wrong base consumption rate was used.

WJ-386 Page 3-136, Paragraph 3 - The document states that grazing by cattle has "probably" reduced the number of plants and "probably" reduced the soil holding capacity of vegetation. We do not find any data in the DEIS or elsewhere to support this statement. The erosion calculations are misleading because sites having different soil types and range sites were compared.

WJ-387 Page 3-139, Paragraph 3 - We disagree with the statement that grazing has reduced fuel loads on McGregor sufficient to lower fire hazards. Sufficient fuel loads have occurred historically on McGregor as evidenced by the frequency of grassland fires in the recent past. Approximately 51,380 acres have burned in the past 5 years, due in large part to military use of the Range.

WJ-388 Page 3-141, Bird-Aircraft Strike Hazards. The Draft EIS identifies the potential risks of bird-aircraft strikes and history of these events in the project area, but does not identify measures that would minimize these risks. Elevational and time restrictions should be considered and established to avoid sensitive areas.

WJ-389 Page 4-5, Noise. We are concerned about current and proposed additional increased noise from military jet flights that impact White Sands National Monument (WSNM); these aircraft take off and land at nearby HAFB. A greater commitment should be made to noise mitigation strategies in future environmental documentation. Direction of take off, i.e. runway selection, is a large determining factor for the intensity and frequency of noise events heard in the publicly-used areas of WSNM. Selection of the north - south runway produces much less aircraft noise at WSNM than does use of the other runways. Take offs toward the southwest produce the most noise over WSNM headquarters and public road.

WJ-390 Pages 4-18 to 19 - These pages predict the baseline level of sound on Otero Mesa to be 57 decibels (db). We believe the actual existing situation is a much lower db level. This would make predictions of noise impact greater than what was actually depicted in the DEIS.

WJ-391 Page 4-39, Paragraph 1 - Refer to our comment above regarding page ES-4.

WJ-392 Page 4-39, Paragraph 3 - The impacts stated are significantly below actual anticipated impacts. Sixty hours of closure to the entire Otero Mesa portion of McGregor Range below Highway 506, some 100 square miles, would prevent critical day to day management of livestock and the operation and maintenance of infrastructure such as extensive high pressure water pipelines, fences, corrals, and other facilities, potentially forcing the closure of the area to grazing. This is not acceptable from our perspective and is certainly not just an "inconvenience" as stated. Also, refer to comment on page ES-4.

WJ-393 Page 4-40, Paragraphs 2 and 3 - We do not agree that the stated noise levels over the Culp Canyon WSA, "are compatible with wilderness management objectives". We do not agree that "noise from overflights do not result in permanent impairment of qualities of naturalness". Consistent, routine, and repeated military low level jet noise over a WSA or any area valued for and enjoyed for its solitude, does permanently degrade and impact the area's value for recreation

WJ-393 and solitude. The feeling of solitude in a WSA does not return the instant a plane departs, but rather, the individual is left with a feeling of disturbance. Further, if that return noise is routine, the value of the WSA as a place of solitude or security diminishes.

WJ-394 Page 4-41, Paragraph 2 - Discussion of land use suitabilities - grazing is a form of agriculture. The area is quite suitable for this purpose.

WJ-395 Page 4-41, last paragraph to top of 4-42 - The Tularosa Basin Option. This site is located totally outside of the grazing units. In addition, the safety buffer occupies substantially less of Otero Mesa than does the West Otero Mesa alternative. It is unclear why the impact to access on Otero Mesa south of Highway 506 is the same as the proposed action, and not reduced. It is also unclear if the intent of this project is to entirely close weekday access to the Mesa regardless of the alternative. Also see comment to page 4-39, paragraph 3 above.

WJ-396 Page 4-71, Paragraph 3 - Use of titanium tetrachloride in inert munitions is proposed on page 3-144, paragraph 3. Titanium tetrachloride is a hazardous material that is poisonous if inhaled, causes skin burns and may contaminate water and soils (Hazardous Materials Emergency Response Guidebook). The toxicity of titanium tetrachloride in inert munitions is not discussed. Any adverse effects to soil, biota, vegetation or wildlife in the short or long term, through accumulation, must be analyzed and discussed in future environmental documentation.

WJ-397 Page 4-78, Paragraph 1 - The Draft EIS states that removal of livestock from the NTC would be a beneficial impact to the insects, nesting birds, and small mammal species in the area. This statement appears irrelevant considering that it is assumed on page 2-26 that the entire 5,120 acres of NTC surface would be disturbed and otherwise have most of the vegetation removed by construction. It is unlikely that the area would improve in condition following elimination of grazing, when it will be subject to significant site disturbance initially and would be subject to annual disturbance due to maintenance and cleanup, and increased fire frequency in the long term. The effects of disturbance associated with continuous use of the NTC are likely to negate any benefits of protection from grazing. In addition, no substantial mitigation is proposed in the document for the loss of or impacts to the desert grassland habitat.

WJ-398 Page 4-78, Paragraph 2 - Sentence 1 states that sources of potential impacts to wildlife from use of an Otero Mesa bombing range would include chaff. On page 4-72, it is stated that chaff would not be used on proposed McGregor Range bombing sites. This discrepancy must be addressed and reconciled.

WJ-399 Page 4-79, Aplomado Falcon Habitat - The Draft EIS states that only 150 acres of aplomado falcon habitat would be lost on the Otero Mesa NTC site and the conclusion was that these impacts would be insignificant. It is unclear how it was determined only 150 acres would be impacted. It is likely that the home range of a nesting pair of aplomado falcons would exceed 150 acres and include most of the NTC. Construction and use of a bombing range on the Otero Mesa would result in continued habitat loss and fragmentation far beyond the 150 acres, causing significant adverse impacts to aplomado falcon habitat that is needed for recovery. The analysis of impacts for this species are not adequately discussed. The potential for disturbance within the 122,000-acre (estimated from Fig.4-24) area from overflights, bombing sorties, and incidental human disturbance, especially during the breeding period is not discussed. In addition, there is no discussion of how range fires could impact the long-term quality of aplomado falcon habitat in

the area. It is known that frequent man-caused fires retard the growth of yuccas, which provide important nest/roost structure in aplomado falcon habitat.

WJ-399

We note that occupied aplomado falcon habitat in Chihuahua, Mexico is grazed and that grazing may have little effect on the species. Specifics on the impacts of livestock grazing, and indeed the dynamics of desert grassland systems, on this species are not well understood at this time. BLM has initiated a 5-year study to obtain specific information in this regard to habitat preferences of the aplomado falcon and associated grazing impacts.

WJ-400

Page 4-88, Paragraph 1 - The DEIS neglects to include and address impacts to the Sacramento Escarpment ACEC and the proposed Alkali Lakes ACEC. The Three Rivers Petroglyph Recreation Area is also proposed for designation as an ACEC.

WJ-401

Pages 4-89 to 92 - See above comments provided for pages 3-89-92.

Page 4-96, Paragraph 2 - The section does not address the impact to wildlife, cattle, livestock operations, and pipeline operations if the water pipeline is damaged and not immediately repaired. In addition, BLM, as the agency responsible for managing grazing on McGregor Range, is the appropriate agency for the agreement.

WJ-402

Page 4-97, Paragraph 1 - There are two wells on the Otero Mesa grazing units. One of these wells is at the Prather Place and the other is at Mary Toy. Ranches to the east of McGregor Range have existing wells.

WJ-403

Page 4-100, 4.8.1.4 - The document should indicate that decontamination of UXO in the area of the Tularosa Basin site is a beneficial impact. The area has been deferred from clean-up by the Army and would now be decontaminated.

WJ-404

Page 4-100, Socioeconomics - The section does not discuss social impacts. Rural residents would be impacted through changes in the character of their landscape, local uses of the land, and would not receive any material benefits.

WJ-405

Page 4-106 - This section does not analyze the impacts of increased military-related use and road closures of State Highway 506, county roads, and BLM access roads on McGregor Range.

WJ-406

Page 4-109 - See also above comment for page 3-133.

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Page 4-109, Water Supply - The DEIS states that in FY 95 daily demands for water in Alamogordo reached 9.5 million gallons per day (mgd). It is also stated that Alamogordo has six wells capable of producing 4.65 mgd and receives water from three spring-fed storages in the Sacramento Mountains. The DEIS does not quantify the amount of water received from the spring-fed storages, but states the 20-inch pipeline from Bonita Lake is currently inoperable. In 1996, HAFB consumed 2.96 mgd. In previous years, a third of HAFB's water was obtained from Alamogordo. It is assumed that without the Bonita Lake pipeline source, HAFB is relying on their well fields for their water supply. The proposed action would increase the future demand for water for industrial, domestic, fire protection, irrigation, and recreational purposes. It is unclear in the DEIS if current water supplies and permitted water rights are adequate to meet water demands for the Alamogordo/HAFB and surrounding area as indicated in Section 4.11 beginning on page 4-109.

WJ-407

Also, it would appear inevitable that there will be an increase in the amount of "fresh" water produced from wells developed in the alluvial fan aquifers to meet water consumption demands in the Alamogordo/HAFB area. The "freshwater" alluvial fan aquifers along the west flank of the Sacramento Mountains are directly connected to the "brackish" (highly saline) Bolson aquifers within the Tularosa Basin. The DEIS fails to evaluate the impacts and potential for the encroachment of "brackish" water upon the "fresh" water aquifers along the edge of the Tularosa Basin as a result of increased pumping of wells to meet water consumption demands under the proposed action and the alternatives.

WJ-408

Page 4-112, last paragraph - Mitigation measures must be more specific and their implementation committed. Consultation with the BLM would be required before any relocation work is done on the pipelines, troughs, and storages.

WJ-409

Page 6-15 - Correct spellings - Christensen to Christensen and Craeger to Craeger.

WJ-410

Appendix D-1 - Data for Dona Ana County is not included.

WJ-411

SUMMARY COMMENTS

It is not appropriate to further consider and we would continue to oppose the degradation of additional, relatively pristine habitat of Otero Mesa when project purposes could be accomplished in other locales that have already been heavily and adversely impacted; other alternatives are available that would result in far less environmental disturbance. We continue to remain extremely concerned that a decision to construct and use a new bombing range on Otero Mesa is premature, will prejudice the cumulative impact analyses and the decision-making process for the above-mentioned other and interrelated NEPA analyses, and will also represent an irretrievable and irreversible commitment of resources.

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It should be noted that a number of actions have been and are currently being considered for the general area and several environmental documents have been developed that address new military airspace and ground use. Each of these are separate and distinct proposals. The alternatives considered in this DEIS do not recognize these previous proposals. This represents a piecemeal approach to the NEPA process because, in part, the interrelationships of all these similar actions are not evaluated to determine their cumulative effect.

U-412

Also, only general measures to minimize, reduce or eliminate adverse environmental impact are discussed in the DEIS. Site-specific mitigative actions must be developed and incorporated into each alternative and option under consideration along with a commitment to implement these necessary and appropriate measures.

In addition, the Endangered Species Act, Section 7 consultation process should be immediately initiated and the assessment/results included as part of the analyses of future environmental documentation. No action should be taken, in this regard, to foreclose potential options and otherwise influence future decisions. To initiate this consultation please contact: State Supervisor, U.S. Fish and Wildlife Service, New Mexico Ecological Services Field Office, 2105 Osuna NE, Albuquerque, New Mexico 87113, telephone (505) 761-4525.

U-413

Our intent, obviously, is to work with the U.S. Air Force to resolve the above issues and develop an environmentally sound and acceptable proposal that satisfies all interests. If we can be of assistance in this regard, should you require additional material or require clarification of any of the above information, please feel free to contact us at the above address or telephone (505) 766-3565.

Sincerely,

Glenn B. Sekavec
Glenn B. Sekavec
Regional Environmental Officer

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COUNTY OF OTERO

1000 NEW YORK AVENUE, ROOM 101
ALAMOGORDO, NEW MEXICO 88310-8835

August 29, 1997

U.S. Air Force
Headquarters Air Combat Command/CEVA
Attn: Sheryl Parker
11817 Canon Blvd. Suite 500
NewPort News, Virginia 23606-2558

Re: Draft EIS on Proposed Expansion of German Air Force Operations at Holloman AFB,
New Mexico

Dear Ms. Parker:

I am the Otero County Public Land Use Planner and I am writing this letter on behalf of Otero County. This letter is a cooperative effort between myself and several interested persons, within the County administration, the Forest Service, and New Mexico State University. Further, this letter is intended to act as written comments pursuant to Title 42 § 4332 and, such comments, pursuant to that provision "shall be made available to the President, the Council on Environmental Quality and to the public...and shall accompany the proposal through the existing agency review processes...."

Pursuant to the Freedom of Information Act, we are requesting that the preparers of the Draft EIS and/or the responsible governmental agency provide to the County and address in the Draft EIS any and all adverse and/or beneficial studies or reports in existence which are pertinent to this Draft EIS process and/or have any regional or programmatic implications.

Pursuant to the Endangered Species Act, we are serving notice that the County expects to be included in all aspects of the Section Seven consultation with the Fish and Wildlife Service. We are notifying the Fish and Wildlife Service of our intention under separate cover.

Our first concern is that pursuant to 42 §4334(2), in which NEPA states that there is a specific statutory obligation of a Federal agency involved in a significant governmental action to coordinate ... with any other Federal or State agency, this County formally requests that the Air Force grant joint Lead Status on this NEPA mandated procedure and/or that we be granted cooperating Agency Status on the EIS. As we indicated during our August 20, 1997 conference with the representatives of your contractor on the EIS, we have several significant studies in progress that will provide invaluable

information to the EIS process which will avoid duplication of effort and will guarantee that the County's resources and assets that are available through our own environmental planning are given full consideration in the process. Although Chapter 55, in which NEPA is located, does not limit the authority of any governmental agency in any permanent or conclusive manner, NEPA does mandate that action be taken only in complete awareness on the part of the actor, in this instance the Air Force, of environmental consequences of the proposed action, and that the actor first take steps to promote awareness of all the issues involved. With that in mind, the significant studies which are mentioned above specifically address Otero County separately. The studies which are relied upon in this draft EIS use a New Mexico State model, which the County feels is inappropriate in that Otero County is unique in its economy, geography and culture within the State of New Mexico, and that extrapolations using a State model are inadequate and will reflect inaccurate data.

To the extent that we have been able to do so, and as a result of the short notice and inadequate participation that was afforded to us, we have gathered and provided documentation of our concerns. At our meeting on August 20 with your team of contractors from Albuquerque, we provided studies and documents as set forth on Exhibit "A" which is attached to this letter. In addition, at this time we would also like to provide the following documents:

1. John Fowler's "Analysis of the economic impacts to Otero County of removing cattle from McGregor Range for proposed new target complex on the Otero Mesa. (Exhibit "B")"
2. New Mexico Cattle Grower's Association letter to G.B. Oliver (Exhibit "C")
3. An Annotated Bibliography Medical Effects of Environmental Noise (Exhibit "D")
4. Letter of April 2, 1997 to Mike Dalby at the Chamber of Commerce for Alamogordo regarding the County Commissioner's position on the expansion. (Exhibit "E")
5. Letter of July 11, 1997 to Sheryl Parker by Ronny Rardin submitting concerns and supporting the use of the Tularosa Basin portion of McGregor Range. (Exhibit "F")
5. Southwest Ranges (areas) map (Exhibit "G")
6. Several regional newspaper articles demonstrating regional concern about the action. (Exhibit "H")
7. Map demonstrating duck migration corridors. (Exhibit "I")
8. BLM article entitled migration (Exhibit "J")
9. Letter to Rodney A. Coleman from Bob Armstrong Assistant Secretary, Land and Minerals Management of the Department of Interior. (Exhibit "K")

What follows are our comments and concerns regarding the present state of the language in the draft EIS.

WJ-415 The Draft EIS, in the Executive Summary (hereinafter referred to as EIS) does not address the unique nature of the Otero Mesa proposed NTC that would be an irreversible and irretrievable commitment of resources. The Otero Mesa NTC option would commit resources of that area in the nature of land use, archaeological and cultural irreplaceable assets and resources. Otero Mesa is the only land of that size and significance in the continental United States.

WJ-416 The draft EIS does not recognize the fact that only twelve percent (12%) of all land within Otero County is privately held. Eighty eight percent (88%) of the land is publicly owned. Accordingly, the effect of management decisions on public land in our county is vastly greater than is the case in other areas.

WJ-417 Turning to the Executive Summary, although I recognize that many of the County's comments are addressed in the body of the EIS, it remains imperative that the Executive Summary fully disclose to the decision maker the actual impacts faced by the human environment. It is the County's concern that the Executive Summary contains many conclusory statements that this County does not agree with. As a local agency that is authorized to develop and enforce environmental standards, it is within this County's discretion under 42 §4332 to provide its comments and/or views to accompany the proposal through the existing agency review processes and those comments should be contained within the body of the executive summary as opposed to being buried in the body of the draft.

WJ-418 It appears that there may be a misstatement of the significance of the "ALCM/Talon action" at page ES-2, in which the EIS states "[t]his action would capitalize upon using restructured airspace from an unconnected previous proposal." It is immediately apparent that this project may be an exercise in segmentation, or a breaking up of a project into segments in order to invite the appearance of a lessened environmental impact. For instance, the EIS provides a baseline comparison throughout which the draft conclusions are apparently based upon FY00 levels. Is this baseline comparison taking into consideration the implementation of the ALCM/Talon action which already raises noise levels and provides the appearance that there will not be a significant increase? It is Otero County's comment that the EIS is unclear on whether or not the FY00 baselines are truly reflecting the increases in, among other things, noise levels and whether or not those baselines in fact include the effect of the ALCM/Talon action. Further, it is the County's position that the Southwest Range (areas) as provided in the Congressional Report addressed to The Honorable William J. Perry, Secretary of Defense dated May 9, 1996, specifically figure 3, attached as Exhibit "G" which reflects the Southwest Ranges in a map form, is in fact one program and should be addressed by the responsible governmental agency in the form of a program impact statement as mandated by NEPA. Additionally, McGregor Range and New Mexico as a whole are one region and should be addressed by the responsible governmental agency in the form of a regional impact statement as mandated by NEPA. Of course, this draft EIS utterly fails to recognize these other areas and attempts to take advantage of the above referenced segmentation.

WJ-420

WJ-421

UJ-422 The EIS at page ES-2 does not fully discuss the "No-Action alternative." The FY00 estimates of noise levels, socio-economic impacts, etc., are not addressed and do not provide an accurate way in which to compare it as a serious alternative. The purposes of an environmental impact statement are to detail the environmental and economic effects of proposed federal action to enable those who did not have a part in its compilation to understand and consider meaningfully the factors involved. It also compels the decisionmaker to give serious weight to environmental factors in making discretionary choices. If asked to review the adequacy of this EIS, a court would have to determine whether the EIS was compiled with objective good faith and whether the resulting statement would permit a decisionmaker to fully consider and balance the options taking into account environmental factors. The "No-Action alternative" does not provide the level of information to the decisionmaker to allow for an educated decision based on more than what the options involving change are. In order to fully realize the impacts of the decision, the decisionmaker must fully understand what the conditions will be like in absence of the proposed action. Additionally, there is no mention of the effect that the no action alternative would have on existing discussions and negotiations with the Germans. Have they indicated that they will not come to use the facilities if there are no changes to the existing program?

UJ-423

UJ-424 Page ES-4 reflects an inadequate assessment of the loss of grazing lands on Otero Mesa. First, there is an ambiguous statement as to the actual amount of land to be lost. "Portions of grazing units 9 and 13" is an ambiguous statement and in no way allows a decisionmaker to understand the full impact of the proposed NTC on the agricultural community in the Otero Mesa area. In order to understand the impacts, the decisionmaker must be educated about the particular types of agriculture occurring in that area and how those people use the land. Further, by stating that there would be a reduction in available grazing land on McGregor Range by less than two percent (2%) does not indicate whether the remaining 98% of the land is actually suitable for grazing and who it is available to be used by. In addition, this percentage does not reflect whether it is including or excluding the buffer zone which may or may not be successfully used as grazing land. The buffer zone is not addressed as an impact on agriculture in the form of livestock. Will the noise affect the livestock in an adverse way? See John Fowlers work which is attached as Exhibit "B".

UJ-426

UJ-427 Page ES-5.6 states that "[i]n no instance would the proposed action be expected to result in a significant adverse impact to biological resources." Yet in the next paragraph, the EIS states that the West Otero Mesa NTC would result in the loss of individual plants of grama grass cactus, a State-listed sensitive species. These statements read together are ambiguous and do not relate whether or not a significant number of the plant species would be lost. The missing data needs to inform the decisionmaker about how many of the plants will be lost in relation to the total remaining. As it stands, it appears to be a conclusion based upon speculation and not actual studies. In addition, the statement "about 150 acres of habitat for the aplomado falcon would be lost, resulting in low impacts" is incomplete and unsupported. There is no total of available habitat provided from which we can compare the loss of "150 acres". Thus, we cannot make an informed opinion as to whether the loss of that habitat is in fact a "low impact". The statement "Potential habitat for the Arizona black-tailed prairie dog, swift fox, and burrowing owls may be present at this site," is an ambiguous statement and is not supported by definitive statements as to whether or not the habitat exists and if

UJ-429

UJ-430 It does how much will be lost. Further, there is no statement as to the status or level of protection given these biota by either State or Federal governments. Item number 1 listed on Exhibit "A" addresses "Areas of Critical Environmental Concern" that are located within the Otero Mesa Area. The Draft EIS fails to consider this important document and is therefore incomplete. Additionally, Exhibit "K" reflects that the Department of Interior has significant concerns about the Otero Mesa site. The proposed move onto the Mesa is set to occur just two years prior to the expiration of the withdrawal in 2001. Bob Armstrong describes the area as follows:

UJ-431

Otero Mesa and Foothills area, which comprises 271,000 acres, is home to some of New Mexico's finest native grasslands and one of New Mexico's finest antelope herds. It has diverse plants and wildlife, healthy watersheds, minerals, cultural and paleontologic resources, and vast open spaces. The Culp Canyon Wilderness Study Area and four Black Gramma Areas of Critical environmental Concern are special management areas located in the Otero Mesa and Foothills portion of McGregor Range. Livestock grazing in this area is also historically important and continues to be an important traditional social, functional, and economic use of the land. We strongly believe that the public interest is best served by BLM managing these important resource values and land uses under FLPMA.

UJ-432

UJ-433 Page ES-6, the statement under the Existing Range option does not address taxpayer savings by the lack of need for construction funds. Further, the statement "Overall, the probability of a sortie, causing a response by wildlife would be roughly equivalent between the FY00 baseline and the proposed action options," does not clearly state its meaning in plain english.

UJ-434

UJ-435 At page ES-8 under Water Resources, there is missing data regarding the importance of water in all the option sites due to the lack of that resource in all the proposed areas in New Mexico. Water issues cannot be addressed in the same manner as they are addressed in other areas of the country. In an area that is considered desert terrain, water issues are the primary concern. The statement regarding the existing water supply distribution system on and near the west Otero Mesa NTC site that would be adversely impacted by construction and use of the site does not address how the system would be impacted, what the supply system is used for, who it supplies water to, nor does it address whether the supply system would be permanently or temporarily adversely impacted. Items 2 and 3 on Exhibit "A" contain important information regarding water resources in Otero County. Additionally, Item 3 contains information that directly contradicts information about water use from Air Force wells on page 3-131 of the Draft EIS.

UJ-436

At page ES-9 under Socioeconomics, there is no mention of the adverse impacts on the agricultural community through loss of grazing lands in all the potential areas, with special concern for the West Otero Mesa area due to its unique nature. There has been provided, on August 20, 1997, an "Otero Break Even Analysis Table, revised 5/27/97" study which addresses the adverse effects faced by

WJ-4437 Ranchers in Otero County if the proposed action occurs. Several other studies were provided during the August 20, 1997 meeting with your team of contractors held at the Otero County Court building. In addition, Exhibit "B" attached hereto indicates that the impact would be substantial.

WJ-4438 At page 2-13, top of the page, there is no statement regarding the reason that the Tornado crews cannot complete their training in Germany. It is this County's understanding that low-level training flights have been banned in Germany. If so, this issue must be addressed both in the Executive Summary as well as this particular page. Further, the EIS states that the maximum mission distance for the Tornado is 180 NM from base. However, the Fact Sheet provided in Appendix A states that the Tornado can patrol for more than two hours at 350 NM from base. This information means that the actual distance that the Tornado can cover in a training mission is at a very minimum 350 NM from Holloman with an additional two hours of training time at that distance. With this information, several of the initially proposed sites can be reconsidered.

WJ-4440 In the body of the EIS, at page 3-1, even though the impact analysis was started March, 1996, and the only available air data is two or more years old, this EIS is dealing with FY00 baseline data which cannot be accurately described without presenting how the data was calculated. In absence of this data, the FY00 baselines which are used to calculate the air quality standards cannot aid a decisionmaker in giving serious weight to environmental factors in making choices. This problem becomes especially egregious at page 3-7, 3.1.2 FY00 Conditions, which does not address what the "couple of exceptions" is or are, nor does the section address the cumulative effects of the proposed changes as is required. The statement that the previous proposed actions will not have a significant environmental impact does not fully address the impact if it does not address the cumulative impacts.

WJ-4441 Again, page 3-21, does not address adequately who the people are that are leasing the lands. The statement that these lands are merely leased does not adequately address who the lessors are and why the lands are leased.

WJ-4445 Page 3-40, which addresses attainment status of Ambient Air Quality Standards, does not address whether or not the prevailing winds will carry the increased air pollutants into non-attainment counties in New Mexico. The statement that the proposal does not exist within a non-attainment area is insufficient to address the possible environmental impact.

WJ-4446 Page 3-78 addresses the vegetation common to the Otero Mesa proposed NTC, however there is no indication as to the status of any of the vegetation as being protected, endangered, etc. Additionally, at page 3-79, the EIS states that two species of rattlesnakes have been reported only from the grassland habitat on Otero Mesa. This statement ends without addressing the danger of potentially destroying this habitat and what impacts the loss will have on these species. Further, this information should exist in the Executive Summary. Continuing to address the wildlife species existing on the Otero Mesa, the responsible agency must keep in mind that those decisionmakers reading this EIS do not have the knowledge or expertise that each preparer possesses. With that in mind, page 3-81, lists several bird species without addressing their protected status, i.e. whether they are protected, endangered, etc. Realizing that there is a table provided at 3.5-4, these classifications should be

WJ-4448 included in the paragraph after each species is introduced and addressed. Further, the tables and the EIS in general do not adequately define what exactly is a Species of Concern (SOC). In order to determine that, the decisionmaker would have to go outside the EIS. It is the County's position that the EIS inadequately defines what each status means and what the difference really is between when the state labels a species endangered versus when the US labels a species threatened and vice versa. The information provided is wholly inadequate to allow the decision maker to determine the impact of the various listings at the State and Federal level. Further, it is the County's position that the EIS does not properly present how many endangered, threatened, SOC, etc., species of plants and/or animals really are affected by the proposed action in each of the proposed NTC's.

WJ-4449 Addressing page 3-92, it is the County's understanding that the Mescalero Apache Indian Tribe has been in contact with Holloman AFB and has submitted comments. Further, the County does not have sufficient information with which to comment on the seventeen sites which were determined to be eligible for registration as an historic site by the National Register. What was the criterion used to differentiate between those seventeen sites and the other four sites that were deemed not to be eligible. The foregoing statement is based on the EIS's presentation of the potential cultural resources sites. It is the County's position that registration should be applied for on these sites with the National Register and either gain the status of protected cultural sites or have that status rejected before any action is implemented.

WJ-4452 Regarding page 3-100, in addressing the Sacramento Watershed, the EIS does not address what would have to be done to the pipeline and the two large storage and distribution tanks located in and around the Otero Mesa NTC. As mentioned in the comments regarding the Executive Summary, the EIS seriously understates the importance of water in the proposed NTC areas. In the absence of average yearly rainfall, etc, for the proposed sites, the decisionmaker cannot adequately weigh the environmental impacts in order to make a truly informed decision.

WJ-4454 At page 3-136, there is a conclusory statement regarding the grazing of Otero Mesa by cattle. The statement is the sentence containing the word "probably". This is conclusory and apparently is not based upon any scientific data. It is the County's opinion that this language should be stricken, absent some data that is available to support it.

WJ-4455 Addressing page 4-5, which refers the reader to appendix C for an education on noise. At C-13, the explanation addresses the disparity between aircraft noise and work related noise, which the study actually addressed. It is the County's position that there is such a difference between the two instances of noise that they cannot adequately be addressed together or compared to one another. In the instance of work related noise, the study is addressing long periods of constant noise at a certain decibel level. In contrast, when dealing with aircraft noise, there is actually very little constancy in noise levels as supported at page C-15 at C.2.5. Any credible study will find that aircraft noise levels are constantly fluctuating depending on altitude, speed and distance to the subject receiving the noise. Since that is the case, findings regarding work related noise cannot legitimately be used to extrapolate the effects of aircraft noise.

Further, the conclusory statement at page C-14 cannot exist within this EIS. The statement, "[i]n summary, there is no scientific basis for a claim that potential health effects exist for aircraft time-average sound levels below 75dB," is unsupported by the foregoing two paragraphs in which there were scientific studies cited which concluded both that there were potential health hazards and that there were not health hazards. In light of the different studies discussed, the summary conclusion is misleading and should not be in the EIS in its current form. The County's concerns are that:

1. The single-number Day-Night Average Sound Level, despite an extensive justification of its use by the Air Force, is not an appropriate metric to use. The single-number Day-Night Average Sound Level is best used to express long-term noise exposure, and was developed to describe multiple noise events over an extended time period (e.g. 24 hours); such as for traffic noise or multiple flights near airfields. It does not adequately gauge the response to intermittent, isolated noise events in quiet rural areas. It is roughly analogous to reporting that the average monthly rainfall in Otero County for August may be 4 inches, but whether that rain falls evenly all month, or suddenly in one hour, has a significantly different impact on soil erosion.
2. Noise averaging as suggested in the draft EIS is deceptive because it dilutes the impact of sudden and extremely loud noises by spreading them out over the relevant time period (24 hours), especially when there is a low ambient noise level. (As is the case in the rural environment of Otero County) Ear shattering overflights registering in excess of 130 dB have an insignificant effect on the "average" thus, their real impact on the environment and on the human environment is masked.
3. The average noise level in rural or wilderness areas, which are very quiet, is much lower than it is in urban environments. Because of the relative quiet of the local environment, the level of annoyance will also occur at lower dB levels than it will in urban environments. While a standard of 65Ldn may be appropriate in urban communities and around airports, it certainly is not an appropriate standard for use in our rural environment.

The draft EIS totally fails to take these distinctions into consideration when it concludes that there will be no significant effect as a result in aircraft noise.

In addition, it is the County's understanding that there is a German study which found that there was increased health hazards due to exposure to aircraft noise. Further, it is the County's understanding that this very study was responsible for the German government banning low-level military maneuvers under 1,000 feet above ground level. The Federal Health Office in Berlin, Germany, conducted a study on the long-term effects from the noise associated with military aircraft. The report studied the effects around Hesselberg in Bavaria, Germany, and considered the physical and emotional effects of such noise on children, and found that it can damage a child's immune system. The children were also found more often to be hard of hearing, to suffer from upsets of the motor nervous system, to feel frightened or anxious, and to be bedwetters. Other health effects included loss of hearing, high

blood pressure and behavioral disturbances. This study conducted by the Federal Health Office in Berlin, Germany, should be addressed by this EIS. In addition, Exhibit "D" contains references to several studies which appear to validate the findings apparently made in the German Study. Certainly these articles should be thoroughly reviewed and the EIS amended to reflect their important findings.

Getting back to the body of the EIS, it is the County's position that the use of average noise levels, as is the case throughout the EIS, as a basis on which to make the decision is misleading and inadequate for the purposes of NEPA. It is the County's position that those exposed to the noise addressed in this EIS will not hear "noise averages" but rather will hear the maximum noise levels. Any attempt by the preparers to present the noise in any other way is very misleading and will not enable the decisionmaker, who did not have a part in its compilation, to understand and consider meaningfully the factors involved. It is the County's position that the highest known noise level that will be heard by non-military personnel should be used regardless of time average. It is further the County's position that these values must be related to the decisionmaker as a long-term impact. These noise levels, if the proposed action is approved, will exist and will continue to exist for several years into the future.

The table 4.2-4, reflects day-night average sound level and is misleading to the decisionmaker. The appearance is that the persons receiving the sounds will actually hear the noise levels in the columns under the Sound Level Proposed Action (dB) at the given reference points when in fact the actual noise that the receiver will hear is the highest noise possible for that reference point. These are the values that the County feels are more accurate to the proper understanding of the environmental impacts. The County has similar feelings toward Table 4.2-6, at pages 4-22,4-23; Table 4.2-7 at pages 4-24,4-25; Table 4.2-8; Table 4.2-9; the figure at page 4-30; Table 4.2-11; and Table 4.2-12.

Again, page 4-28 reflects average noise levels which are not really what people hear and are inadequate and misleading to the decisionmaker.

Addressing page 4-39, the EIS falls short of adequately relating several issues. The EIS is not clear as to whether or not state road 506 itself will be closed an additional 60 hours per week. If that is indeed the case, there will be a significant impact on the flow of local traffic particularly from the mountain communities of Timberon, Weed, Mayhill, Sacramento, Crow Flats, and Pinon. State Road 506 is the only direct route from those communities to the regional metropolitan, urban, manufacturing, and shopping hub in El Paso, Texas, and Alamogordo, New Mexico. Additionally, State Road 506 is the only route by which emergency ambulance, fire and other law enforcement personnel can obtain access to the above referenced communities when circumstances require use of that Southern route to gain immediate response when required. The Draft EIS fails to consider these factors and is therefore incomplete and inaccurate.

Additionally, there is no quantification of what "portions of units 9 and 13" will really be impacted by the proposed alternatives. Further, the representation of the loss of 1.5 percent of AUMs up for auction from the McGregor Range does not adequately address who the losses would affect. Further, there is no mention of where these losses would be made up by those incurring the losses. The

conclusionary statement that the loss of grazing lands would be "insignificant" is very misleading and is not supported in the document. Fully forty percent (40%) of the BLM allotments in the State of New Mexico are minority owned, yet there is no recognition of the effect of the proposal on minority populations.

UJ-464

[See item number 6 on Exhibit "A" to consider the effects of the withdrawal on marginal or below break even cattle operations in the County.]

UJ-465

[Exhibit "B" attached hereto demonstrates that the total effect of the loss of these ALM's will result in an economic loss within the County of one hundred fifty to two hundred thousand dollars. What remains to be seen is which of our citizens will actually bear this loss and how many of those people will accordingly lose their livelihood. What impact will those losses have on the culture of Otero County? The draft EIS does not address these important issues.]

UJ-466

[At some point in the next several weeks, both the New Mexico Western University Minority Study and the New Mexico State University, Otero County specific, Economic Input Output Studies will be complete and will be forwarded to you immediately upon our receipt so that your EIS will be more complete and accurate.]

UJ-467

[Pages 4-39 and 4-40, do not define the alleged inconvenience to ranchers and BLM employees. Further, the draft cites "delayed repair of damaged pipelines" as an example of this alleged inconvenience without determining when these inconvenienced persons would be able to take care of their business i.e. repair pipelines which are leaking. How precious is the water particularly during the hot dry periods of the year to cattle? How many head will be lost while the rancher or BLM employee is waiting to enter the area to make repairs?]

UJ-468

[The first full paragraph at page 4-40 is wholly inadequate to allow the decisionmaker to determine how "extremely limited" access during the week would be and what the few restrictions would be during the weekend. The terms are so vague and nebulous that the County is unable to effectively respond to the impact that those programmatic restrictions would have on our custom, culture, and environment both natural and human.]

UJ-469

[Page 4-41, states that overflights of this area, Otero Mesa, could be startling to the residents. This statement does not give actual dB levels that will be heard by the residents. The County, again is not interested in receiving average sound levels but rather actual maximum sound levels as would be heard by persons affected. As stated, this statement is conclusory and appears to not be based on any given scientific data.]

UJ-470

[Addressing section 4.6 at page 4-85, archaeological, cultural, and historical resources, this section contains a statement that is misleading. "Native American groups currently residing in, or with historic ties to the affected areas are also being contacted." This statement is true, but only in part. The County has been in contact with the Mescalero Apache Indian Tribe, specifically Ms. Lisa Meyer. As of the drafting of these comments, the Mescalero Apache Indian Tribe has not received adequate,

UJ-471

requested, documentation from the preparers to comment on sensitive tribal, cultural, archaeological and historical resources. Further, pages 4-90 through 4-91 are misleading to the decisionmaker because there is an appearance that there has been cooperation with the Mescalero Apache Indian Tribe, which is not the case. The Mescalero Apache Indian Tribe has requested the site specific inventory regarding the archaeological sites. As of the date of this letter, that inventory has not been delivered. Because of that, the Tribe has been unable to determine for itself whether or not some or all of the other 4 sites found should be treated as being eligible for registration.

UJ-471

[In addressing the section under 4.7, Water resources, the initial paragraph should state that any impact to water resources in the proposed NTC areas is significant. The only thing that could realistically result in no significant impact would in fact be the no-action alternative. The proposal included the location of a four mile by two mile impact site on Otero Mesa. This impact site will incur significant surface disturbance so that targets can be located on the site. That disturbance will necessarily require the wholesale destruction of native plantlife on the Mesa. In the arid desert terrain and environment that comprises Otero Mesa, the destruction of these native plants and grasses will have disastrous effects which are long term in nature. Vegetation in those areas is very slow to grow and will take in excess of one hundred years to regenerate. Dr. John Fowler can shed considerable light on these issues if given the opportunity.]

UJ-472

[The section addressing the Socioeconomic impacts of the proposed action, specifically 4.9.1.3, entitled Impacts Specific to the West Otero Mesa Option, does not fully address the impacts associated with the loss of the grazing lands used in the Otero Mesa NTC option area. Further, there is no economic analysis of these impacts on the agricultural market in small through large cattle-ranching operations. (see item 6 Exhibit "A" and Exhibit "B")]

UJ-473

[Section 4.13.1.5 Bird-Aircraft Strike Hazards utterly fails to analyze how increased air traffic will affect migratory fowl who use New Mexico air space for their migratory flights. Exhibits "f" and "g" demonstrate that migratory birds indeed use the area in significant numbers. The EIS is deficient in its failure to analyze these impacts on the birds. It merely addresses safety issues concerning personnel.]

UJ-474

[The following contain general comments on issues that were not addressed at all within the EIS. There is no mention of the Air Force accepting liability for any and all damages that will occur through the damage and destruction of the grazing lands. On that same note, there is no indication that the Air Force intends to mitigate those damages that will occur to the region if and when the proposed action is implemented. Another issue that the County feels is significant is along the same vein as the liability and mitigation issues. The concern is that there is no mention of a study which finds that property values will be diminished by 1% per 1dB increase in noise levels in and around the property in question. If this is the case, this damage is not at all addressed within this draft EIS.]

UJ-475

UJ-476

UJ-477

[As a final matter, under NEPA, there is not supposed to be an appearance of a decision made. It concerns the County in reading this EIS that Otero Mesa has already been chosen as the NTC and

UJ-478

The figures and studies presented are an attempt to justify that decision. In addition, the County is aware that there has been a road already built that extends very close to the Otero Mesa NTC. The County is aware that this road was constructed by the Army Corps of Engineers and appears to be in anticipation of the selection of Otero Mesa as the NTC site. This selection appears to be in direct violation of the mandate of NEPA and must be addressed.

In conclusion, we reiterate the position taken in our April 2, 1997, and July 11, 1997 letters. Otero Mesa is not the preferred site. If the proposed action is to be implemented, it is the County's position that the responsible governmental agency develop one of the other less objectionable sites referred to in the proposal.

Please address each of our concerns individually. Additionally, this comment letter should become a permanent part of the EIS and our comments should be reflected in the body of the final EIS, not merely buried in the document as an attachment.

We are requesting written acknowledgment of receipt from your office. Please call my office with any questions you may have regarding these comments.

Sincerely,

Michael Nivison

Mike Nivison
Otero County
Public Land Use Planner

Enclosures: as noted

cc: Ruth Hooser, Otero County Administrator
Ronny Rardin, County Commissioner
Tim McGinn, County Commissioner
Richard Zierlein, County Commissioner
Daniel A. Bryant, County Attorney

- Documents Received 8/20/97
- 1.) Otero County AFE Resource Management Plan Amendment, August 1997
 - 2.) Draft Julgarosa Basin and Sageramento River Basin, Regional Water Plan, 2000-2040, June 1997
 - 3.) Well Diversion Meter Record - 1997
 - 4.) Purchasing Patterns of Range Livestock Sector (set of overhead slides)
 - 5.) Final Draft Assessment of Potential Problems with Agricutlural Loans to the Livestock Ranching Community, March 31, 1997
 - 6.) Otero Break Even Analysis (table), "revised 5/24/97"
 - 7.) Competitive Pricing for the Mc Gregor Range: Implications for Federal Grazing Fees, March 1994
 - 8.) Excerpt from R.A.M.A. (?) comment concerning German Federal Health Office of health effects from noise of low-flying jets.
 - 9.) Regional Economic Impact (I-O model description)



From	To	Value
7671	7672	100000
7672	7673	100000
7673	7674	100000
7674	7675	100000
7675	7676	100000
7676	7677	100000
7677	7678	100000
7678	7679	100000
7679	7680	100000
7680	7681	100000
7681	7682	100000
7682	7683	100000
7683	7684	100000
7684	7685	100000
7685	7686	100000
7686	7687	100000
7687	7688	100000
7688	7689	100000
7689	7690	100000
7690	7691	100000
7691	7692	100000
7692	7693	100000
7693	7694	100000
7694	7695	100000
7695	7696	100000
7696	7697	100000
7697	7698	100000
7698	7699	100000
7699	7700	100000

Analysis of the economic impacts to Otero county of removing cattle from the proposed new target complex on the Otero Mesa.

The official removal of Aums (425 Aums) for the McGregor Range is for the new target complex, which is an area of 2 miles by 4 miles. The New Mexico State Input-Output model and the Chaves county Input-Output model are used to estimate the economic impact to Otero county. The removal of the AUMs would have an initial impact to Otero county of an estimate loss of \$30,648 - \$38,022 in economic activity (dollar flows), \$9,760 - \$10,029 in personal income, and 48 - 53 full-time jobs (Tables 1a and 2a).

The assumption is made that the cattle in units 9 and 13 will move away from the noise of the target complex, and therefore further reduce the AUMs or overgrazing of the remaining grazing units. Assuming the AUMs are removed from the "footprint" or buffer zone, the total AUMs removed from the McGregor Range are estimated to be 2,181. Economic impact to Otero county of removing these AUMs are estimated to be a loss of \$157,280 - \$195,120 in economic activity, \$50,087 - \$51,465, and 2.47 - 2.74 jobs (Tables 1b and 2b).

The above impacts are only initial estimated impacts for Otero county. Because the Otero county Input-Output model is not completed, the state and the Chaves county models were used to estimate a range of impacts. Also more information is required about the impacts (production, reaction, and reproduction) of noise on range cattle, also, because the acre and AUMs were estimated in this analysis, definite data is required for further analysis.

Other comments and concerns

Page G-50 presents multipliers of 7.5 - 29.7 these numbers are highly questionable. A multiplier greater than 2 should be subjected to critical review (Income Multipliers in Economic Impact Analysis).

McGregor range has played a significant role in setting federal grazing fees as documented by the following testimonies:

- Testimony by Dr. John M. Fowler, before the House of Representative's National Parks and Public Lands Subcommittee on pending grazing fee legislation, September 22, 1987.
- Testimony by Dr. John M. Fowler to Senator Domenici, "Grazing Fee Hearings", August 31, 1992.
- Testimony of W.R. "Bill" Humphries before the Subcommittee on : Public Lands, National Parks, and Forests of the Committee on Energy and Natural Resources, United States Senate, July 1, 1992.
- Statement to the Committee for Energy and Natural Resources, United States Senate on Rangeland Reform '94. Prepared by Dr. John M. Fowler, May 14, 1994.

Other concerns and importance of McGregor Range in the following:
 Fowler, John M. et. al. "Competitive pricing for the McGregor Range: Implications for federal grazing fees." Journal of Range Management, March 1994.
 Letter to Major Satana Mrs. Sheryl Parker, August 26, 1996, from Dr. John M. Fowler



Table 2a
 Aums Unit Months (AUMs) removed for the proposed expansion of German Air Force Operations at Holloman AFB, New Mexico (McGregor Range, NTC and buffer zone)
 Chaves County 6.6 I-O Model

Sectors	dollar flows		employment	
	Direct	Indirect	Total Impact	Total Jobs/FTE
1 Dairy	0.00	(0.05)	(0.05)	(0.0000)
2 Range Cattle	(40.31)	0.00	(40.31)	(0.0000)
3 Sheep	0.00	(0.00)	(0.00)	(0.0000)
4 Fed Cattle	0.00	(0.00)	(0.00)	(0.0000)
5 Oil Livestock	0.00	(0.00)	(0.00)	(0.0000)
6 Alfalfa Hay	0.00	(0.00)	(0.00)	(0.0000)
7 Other Hay	0.00	(1.52)	(1.52)	(0.0000)
8 Cotton	0.00	(0.11)	(0.11)	(0.0000)
9 Wheat	0.00	(0.05)	(0.05)	(0.0000)
10 Corn	0.00	(0.07)	(0.07)	(0.0000)
11 Sorghum	0.00	(0.08)	(0.08)	(0.0000)
12 Chile	0.00	(0.07)	(0.07)	(0.0000)
13 Apples	0.00	(0.00)	(0.00)	(0.0000)
14 Pecans	0.00	(0.05)	(0.05)	(0.0000)
15 Oil Veg/Fr/Nut	0.00	(0.15)	(0.15)	(0.0000)
16 Other Crops	0.00	(0.10)	(0.10)	(0.0000)
17 Other Farm Income	0.00	(0.02)	(0.02)	(0.0000)
18 Ag Services	0.00	(0.02)	(0.02)	(0.0000)
19 Mining	0.00	(0.01)	(0.01)	(0.0000)
20 Construction	0.00	(0.07)	(0.07)	(0.0000)
21 Dairy Processing	0.00	(0.00)	(0.00)	(0.0000)
22 Oil Food Proc	0.00	(0.17)	(0.17)	(0.0000)
23 Oil Manufact	0.00	(0.96)	(0.96)	(0.0000)
24 Printing	0.00	(0.25)	(0.25)	(0.0000)
25 T/C/P/U	0.00	(0.22)	(0.22)	(0.0000)
26 Wholesale	0.00	(0.08)	(0.08)	(0.0000)
27 Retail	0.00	(0.10)	(0.10)	(0.0000)
28 Eating & Drinking	0.00	(0.15)	(0.15)	(0.0000)
29 F.I.P.E.	0.00	(0.14)	(0.14)	(0.0000)
30 Lodging	0.00	(1.01)	(1.01)	(0.0000)
31 Services	0.00	(0.05)	(0.05)	(0.0000)
32 Health	0.00	(3.21)	(3.21)	(0.0001)
35 Households	0.00	(22.67)	(22.67)	(0.0001)
36 Other F.P.	0.00	0.00	0.00	0.0000
37 Imports	0.00	0.00	0.00	0.0000
Col Totals	(40.31)	(31.82)	(72.11)	(0.0013)

Total impact from:	2.151	AUM in Chaves County, New Mexico	Total
Total economic activity			(157,280)
Total personal income			(50,087)
Total employment			(2,7452)

Table 2a

Animal Unit Months (AUMs) removed for the proposed expansion of German Air Force Operations at Holloman AFB, New Mexico (McGregor Range, NTC only)

Sectors	dollar flows			-employment-	
	Total Direct	Indirect Induced	Total Impact	Total Jobs/FTE	Total Jobs/FTE
1 Dairy	0.00	(0.05)	(0.05)	(0.0000)	(0.0000)
2 Range Cattle	(40.31)	0.00	(40.31)	(0.0000)	(0.0000)
3 Sheep	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
4 Fed Cattle	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
5 Oth Livestock	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
6 Alfalfa Hay	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
7 Other Hay	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
8 Cotton	0.00	(1.52)	(1.52)	(0.0000)	(0.0000)
9 Wheat	0.00	(0.11)	(0.11)	(0.0000)	(0.0000)
10 Corn	0.00	(0.05)	(0.05)	(0.0000)	(0.0000)
11 Sorghum	0.00	(0.07)	(0.07)	(0.0000)	(0.0000)
12 Chile	0.00	(0.07)	(0.07)	(0.0000)	(0.0000)
13 Apples	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
14 Pecans	0.00	(0.05)	(0.05)	(0.0000)	(0.0000)
15 Oth Veg/Frt/Nut	0.00	(0.15)	(0.15)	(0.0000)	(0.0000)
16 Other Crops	0.00	(0.10)	(0.10)	(0.0000)	(0.0000)
17 Other Farm Income	0.00	(0.02)	(0.02)	(0.0000)	(0.0000)
18 Ag Services	0.00	(0.02)	(0.02)	(0.0000)	(0.0000)
19 Mining	0.00	(0.01)	(0.01)	(0.0000)	(0.0000)
20 Construction	0.00	(0.07)	(0.07)	(0.0000)	(0.0000)
21 Dairy Processing	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
22 Oth Food Proc	0.00	(0.17)	(0.17)	(0.0000)	(0.0000)
23 Oth Manufact	0.00	(0.96)	(0.96)	(0.0000)	(0.0000)
24 Printing	0.00	(0.25)	(0.25)	(0.0000)	(0.0000)
25 TIC/PU	0.00	(0.22)	(0.22)	(0.0000)	(0.0000)
26 Wholesale	0.00	(0.08)	(0.08)	(0.0000)	(0.0000)
27 Retail	0.00	(0.10)	(0.10)	(0.0000)	(0.0000)
28 Eating & Drinking	0.00	(0.15)	(0.15)	(0.0000)	(0.0000)
29 F.I.R.E.	0.00	(0.14)	(0.14)	(0.0000)	(0.0000)
30 Lodging	0.00	(1.01)	(1.01)	(0.0000)	(0.0000)
31 Services	0.00	(0.05)	(0.05)	(0.0000)	(0.0000)
32 Health	0.00	(3.31)	(3.31)	(0.0000)	(0.0000)
35 Households	0.00	(22.97)	(22.97)	(0.0000)	(0.0000)
36 Other F.P.	0.00	0.00	0.00	0.0000	0.0000
37 Imports	0.00	0.00	0.00	0.0000	0.0000
Col Totals	(40.31)	(31.80)	(72.11)	(0.0012)	(0.0012)

Total impact from

425 AUM in Chaves County, New Mexico

Sectors	dollar flows			-employment-	
	Total Direct	Indirect Induced	Total Impact	Total Jobs/FTE	Total Jobs/FTE
Total economic activity	(17,132)	(13,517)	(30,649)	(0.0000)	(0.0000)
Total personal income	(7,709)	(2,051)	(9,760)	(0.0000)	(0.0000)
Total employment	(0.2763)	(0.1556)	(0.4319)	(0.0000)	(0.0000)

Table 1a

Animal Unit Months (AUMs) removed for the proposed expansion of German Air Force Operations at Holloman AFB, New Mexico (McGregor Range, NTC only)

Sectors	dollar flows			-employment-	
	Total Direct	Indirect Induced	Total Impact	Total Jobs/FTE	Total Jobs/FTE
1 Dairy	0.00	(0.04)	(0.04)	(0.0000)	(0.0000)
2 Range Cattle	(40.31)	0.00	(40.31)	(0.0000)	(0.0000)
3 Sheep	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
4 Fed Cattle	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
5 Oth Livestock	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
6 Alfalfa Hay	0.00	(1.02)	(1.02)	(0.0000)	(0.0000)
7 Other Hay	0.00	(0.08)	(0.08)	(0.0000)	(0.0000)
8 Cotton	0.00	(0.03)	(0.03)	(0.0000)	(0.0000)
9 Wheat	0.00	(0.05)	(0.05)	(0.0000)	(0.0000)
10 Corn	0.00	(0.06)	(0.06)	(0.0000)	(0.0000)
11 Sorghum	0.00	(0.05)	(0.05)	(0.0000)	(0.0000)
12 Peanuts	0.00	(0.04)	(0.04)	(0.0000)	(0.0000)
13 Potatoes	0.00	(0.10)	(0.10)	(0.0000)	(0.0000)
14 Chile	0.00	(0.07)	(0.07)	(0.0000)	(0.0000)
15 Onions	0.00	(0.02)	(0.02)	(0.0000)	(0.0000)
16 Lettuce	0.00	(0.01)	(0.01)	(0.0000)	(0.0000)
17 Apples	0.00	(0.01)	(0.01)	(0.0000)	(0.0000)
18 Pecans	0.00	(0.04)	(0.04)	(0.0000)	(0.0000)
19 Oth Veg/Frt/Nut	0.00	(0.13)	(0.13)	(0.0000)	(0.0000)
20 Other Crops	0.00	(0.72)	(0.72)	(0.0000)	(0.0000)
21 Other Farm Income	0.00	(0.23)	(0.23)	(0.0000)	(0.0000)
22 Ag Services	0.00	(0.56)	(0.56)	(0.0000)	(0.0000)
23 Mining	0.00	(0.07)	(0.07)	(0.0000)	(0.0000)
24 Construction	0.00	(0.08)	(0.08)	(0.0000)	(0.0000)
25 Meat Processing	0.00	(0.12)	(0.12)	(0.0000)	(0.0000)
26 Dairy Processing	0.00	(0.99)	(0.99)	(0.0000)	(0.0000)
27 Oth Food Processing	0.00	(0.10)	(0.10)	(0.0000)	(0.0000)
28 Oth Manufacturing	0.00	(2.81)	(2.81)	(0.0000)	(0.0000)
29 Printing	0.00	(2.09)	(2.09)	(0.0000)	(0.0000)
30 Trans/Comm/Util	0.00	(2.42)	(2.42)	(0.0000)	(0.0000)
31 Wholesale	0.00	(7.77)	(7.77)	(0.0000)	(0.0000)
32 Retail Trade	0.00	(0.15)	(0.15)	(0.0000)	(0.0000)
33 F.I.R.E.	0.00	(2.62)	(2.62)	(0.0000)	(0.0000)
34 Lodging	0.00	(1.53)	(1.53)	(0.0000)	(0.0000)
35 Services	0.00	(1.07)	(1.07)	(0.0000)	(0.0000)
36 Health	0.00	(0.47)	(0.47)	(0.0000)	(0.0000)
37 State/Loc Govt	0.00	(23.60)	(23.60)	(0.0000)	(0.0000)
38 Public Schools	0.00	0.00	0.00	0.0000	0.0000
39 Households	0.00	0.00	0.00	0.0000	0.0000
40 Other F.P.	0.00	0.00	0.00	0.0000	0.0000
41 Imports	0.00	0.00	0.00	0.0000	0.0000
Col Totals	(40.31)	(49.15)	(89.46)	(0.0011)	(0.0011)

Total impact from

425 AUM in State of New Mexico

Sectors	dollar flows			-employment-	
	Total Direct	Indirect Induced	Total Impact	Total Jobs/FTE	Total Jobs/FTE
Total economic activity	(17,132)	(13,517)	(30,649)	(0.0000)	(0.0000)
Total personal income	(7,709)	(2,051)	(9,760)	(0.0000)	(0.0000)
Total employment	(0.2763)	(0.1556)	(0.4319)	(0.0000)	(0.0000)

Table 1:

Annual Line Iteming (AULIs) removed for the proposed expansion of German Air Force Operations
 at Wicksburg AFB, New Mexico (McGregor Range, NTC and buffer zone)

Sectors	dollar flows			employment-	
	Total	Indirect	Total	Total	Jobs/FTE
	Direct	Induced	Impact		
1 Dairy	0.00	(0.04)	(0.04)	(0.0000)	(0.0000)
2 Range Cattle	(40.31)	0.00	(40.31)	(0.0000)	(0.0000)
3 Sheep	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
4 Fed Cattle	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
5 Other Livestock	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
6 Alfalfa Hay	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
7 Other Hay	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
8 Cotton	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
9 Wheat	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
10 Corn	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
11 Sorghum	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
12 Peanuts	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
13 Potatoes	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
14 Chile	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
15 Onions	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
16 Lettuce	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
17 Apples	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
18 Pecans	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
19 Other Veg/Frt/Nut	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
20 Other Crops	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
21 Other Farm Income	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
22 Ag Services	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
23 Mining	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
24 Construction	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
25 Meat Processing	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
26 Dairy Processing	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
27 Other Food Processing	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
28 Other Manufacturing	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
29 Printing	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
30 Trans/Comm/Util	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
31 Wholesale	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
32 Retail Trade	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
33 F.I.P.E.	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
34 Lodging	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
35 Services	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
36 Health	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
37 State/Local Govt	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
38 Public Schools	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
39 Households	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
40 Other F.P.	0.00	(0.00)	(0.00)	(0.0000)	(0.0000)
41 Imports	0.00	0.00	0.00	0.0000	0.0000
Co. Totals	(40.31)	(49.15)	(89.46)	(0.0011)	(0.0011)

Total Impact from: 2.351 SUM in State of New Mexico

	Direct	Indirect	Total
Total economic activity	(67.916)	(107.204)	(175.120)
Total personal income	(28.658)	(22.807)	(51.465)
Total employment	(1.3224)	(1.1439)	(2.4663)

Table G.4.5-1. Regional Share and Final Demand Multipliers
 by Industry and Regional Definition

Industry	Other Country		ROI	
	Regional Share	Multiplier ¹	Regional Share	Multiplier ¹
Construction (6)	47.70%	11.8	62.48%	16.4
Utilities (27)	43.98%	7.5	55.49%	7.1
Business Services (35)	38.60%	25.7	60.20%	33.8
Health Care Services (37)	48.97%	2.6	65.65%	29.8
Households (39)	42.90%	10.7	63.07%	16.1

¹ Represents the change in number of jobs in each row industry for each additional one million dollars of output delivered to final demand.

Source: BEA, 1996.

COLLEGE OF AGRICULTURE AND HOME ECONOMICS
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August 26, 1996

Major Satana/Mrs. Sheryl Parker
 205 Dodd Blvd., Suite 101
 Langley Air Force Base, VA 23665-2789

Dear Sir and Madam:

I appreciate the opportunity to provide input during the scoping process on the proposed expansion of German Air Force aircraft operations at Holloman Air Force Base, Alamogordo, New Mexico.

There are many issues that could potentially be addressed such as: the impact of the number of training flights, the impact of the low level of flight and the speed of the flight, on wildlife of all species on the specific site as well as the buffer areas, Wilderness Study Areas (Culp Canyon WSA) and areas of critical environmental concern (ACEC's) demand special attention and resultant higher levels of management for habitat protection. Another issue is public access to the area, in particular, the historic use patterns and generated income derived from fee hunting, birding, wildlife viewing etc.

This comment, while hinting at the area's uniqueness from an ecosystem viewpoint, is really focused on a completely different type of uniqueness; the McGregor Range is the only area of significant size (271,000 leased acres) where federal forage is auctioned by quasi-competitive bidding in the U.S. I have been studying this bidding process for nearly a decade and have published journal articles (Fowler et al. 1994). The data has been used as a basis for testifying to U.S. Senate and U.S. House of Representatives on federal grazing fees, and the data base has been included in deriving fees for the State Lands in New Mexico. This time-series data has proved critical to the determination of equitable grazing fees for the State of New Mexico and the Federally retained acreage throughout the West (Fowler et al. 1985). The proposed area is the veritable heart of the McGregor Range leased units. The impacts go beyond simply the immediate units of the specific new bombing range because the bulk of the supporting livestock infrastructure is located there. This infrastructure includes: holding and shipping corrals, tanks and extensive pipelines.

Major Satana/Mrs. Sheryl Parker
 August 26, 1996
 Page 2

The McGregor Range has also played a vital role to the range livestock industries of New Mexico and Texas by providing a flexible source of feed. This role is especially important during drought as evidenced in 1982, 1983 and recently in 1993, 1994, and 1995. Young ranch operators often use the leasing opportunity to get their start in the range livestock industry at McGregor Range. The units provide for some degree of flexibility and stability for New Mexico and Texas.

I strongly recommend an alternative site to the South and West in the Tularosa Basin. The McGregor Range is an area of documented vital academic importance.

Respectfully submitted,

John M. Fowler
 Dr. John M. Fowler
 Professor of Agricultural Economics

JMF/jm

Enclosures

3. Range Manager.
4. 1985-86, March 1984

Competitive pricing for the McGregor Range: Implications for federal grazing fees

JOHN M. FOWLER, L. ALLEN TORELL, AND GRAY GALLACHER

Authors are professors and former research assistants, Department of Agricultural Economics and Agriculture Business, New Mexico State University, Las Cruces 88003.

Abstract

Competitive bidding is an acceptable way to determine an efficient price to both buyer and seller. The quasi-competitive bid structure used to price federal forage and lease-provided services on the McGregor Range in New Mexico indicates that the efficient market price for federal forage, services, and facilities had an upper value of \$1.64/AUM during the 1992 grazing season. The facilities and services provided on the McGregor Range had a value of \$1.96/AUM to the ranchers leasing the bombing range. The rental amount of \$1.92/AUM represents the estimated value of high quality federal forage during 1992. The total cost of grazing the McGregor Range was estimated to average \$16.78/AUM during the 1992 production year. This is less than the cost of leasing comparable private land (\$19.64/AUM) or BLM land (\$21.84/AUM) in New Mexico.

Key Words: grazing fees, competitive bidding, forage value

Controversy and grazing fees have emerged as synonymous terms. The issues have evolved and matured to the extent that emotion, which can rapidly surge and abate, is being carefully controlled by conditions of special interest groups. The coalitions work diligently to market their respective positions. Political ramifications are paramount. However, recent efforts have been directed toward educating the general public, with each new urban and suburban generation further removed from agricultural production practices.

The heart of the public land controversy is who shall "control" federal land. The power struggle evolves around 2 central themes: (1) the trend in ecological condition of western rangelands and (2) the price level that simultaneously provides a reasonable rate of return to the federal treasury and the opportunity to earn a positive return for rancher permittees. Ecological condition assessment is conducted by the managing agency which determines a long-run carrying capacity for each allotment. The long-run carrying capacity can be adjusted through suspended preferences or voluntary reduction, i.e., taking nomads for resource or economic reasons or by applying for temporary nonrenewable increases in stocking rate if resource conditions are favorable. The end result is that livestock numbers are regulated and do not respond to traditional economic and market forces. Therefore, the supply of forage allocated to livestock is relatively fixed in annual unit months (AUMs) of grazing available. This direct attention to the price level of federal forage as a factor of production, to the range livestock industry and as a revenue source for the federal government, leaving less renewable forage resources.

Keywords: Grazing fees, Agricultural Economics, Range and Forage Improvement, Public Land, Competitive Bidding, Forage.

Technical assistance provided by: J. R. Taylor, Jr., New Mexico State University, Las Cruces, NM 88003.

et al., 1992; Kromont et al., 1993). A significant application of this method, for example, was determination of the \$1.21/AUM base value used in the current federal grazing fee formula (USDA/USDI, 1977). By this method, total private grazing costs defines the amount willingly paid for grazing within a competitive market. Subtracting per-acre costs on public lands from this amount gives an estimate of the amount that would make total private and public grazing costs equal.

Higher grazing costs on public lands because of location, distance, terrain, productivity, multiple uses, and regulations are directly considered using the total cost approach to valuation (Bartlett et al., 1993). However, previous studies that compare to the private forage market have not adjusted for quality differences or for the multiple use management objectives on public lands that are not a restriction with private forage leases (except to the degree that grazing costs are impacted by these regulations). In order to minimize the adjustments for these relatively intangible variables it is necessary to observe a large scale competitive market established for federal forage and use this directly to price federal forage. This type of pricing scenario occurs at a unique setting known as the McGregor Range in southeastern New Mexico (Fig. 1).¹

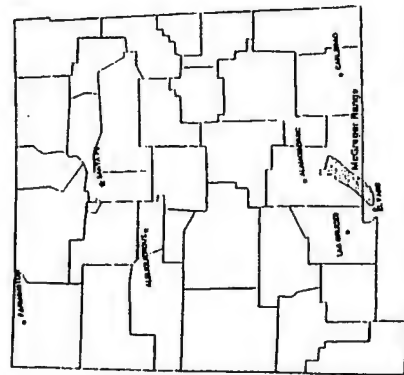


Fig. 1. Location of McGregor Range in southeastern New Mexico.

Study Area and Methods

The McGregor Range is controlled by the Department of the Army and the surface range forage is administered by the Bureau of Land Management (BLM). The McGregor Range is comprised of 14 separate units ranging in size from 3,000 acres to 32,000 with the average slightly over 19,000 acres (Table 1). Grazing seasons traditionally have been 5 months with leases usually starting in October. Currently 3 units are leased for 8 months and 1 unit for 18 months. The grazing units are leased during the growing season (July, August, and September).

The McGregor Range is the only area of significant size (71,000 leased acres) where federal forage is auctioned by quasi-competitive bidding. The McGregor Range situation is not a true competitive bid; only the up-bid is competitive. A floor of \$3/AUM was

¹For more detail on the McGregor Range see Bartlett et al. (1993).

Table 1. McGregor Range grazing leases (1992 grazing season).

Unit number	Size (Acres)	Approximate AUMs	Minimum allowable bid	Actual bid
1	31,000	4,950	4.30	4.96
2	31,000	2,322	4.50	4.50
3	12,000	2,222	4.00	4.25
4	12,000	3,825	n/a	n/a
5	25,000	2,700	n/a	n/a
6	19,000	2,702	5.00	5.00
7	17,000	726	4.50	7.65
8	11,000	1,911	4.50	4.83
9	12,000	2,702	5.25	n/a
10	12,000	3,000	8.00	8.00
11	8,000	1,351	5.25	5.70
12	20,000	3,222	4.25	n/a
13	12,000	1,815	4.50	4.50
14	12,000	1,198	4.00	6.15
TOTAL	271,000			

¹Units 1 and 2 were not available for bidding in 1992. Units 3 and 4 were not available for bidding in 1992. Units 5 and 6 were not available for bidding in 1992. Units 7 and 8 were not available for bidding in 1992. Units 9 and 10 were not available for bidding in 1992. Units 11 and 12 were not available for bidding in 1992. Units 13 and 14 were not available for bidding in 1992. Units 15 and 16 were not available for bidding in 1992. Units 17 and 18 were not available for bidding in 1992. Units 19 and 20 were not available for bidding in 1992. Units 21 and 22 were not available for bidding in 1992. Units 23 and 24 were not available for bidding in 1992. Units 25 and 26 were not available for bidding in 1992. Units 27 and 28 were not available for bidding in 1992. Units 29 and 30 were not available for bidding in 1992. Units 31 and 32 were not available for bidding in 1992. Units 33 and 34 were not available for bidding in 1992. Units 35 and 36 were not available for bidding in 1992. Units 37 and 38 were not available for bidding in 1992. Units 39 and 40 were not available for bidding in 1992. Units 41 and 42 were not available for bidding in 1992. Units 43 and 44 were not available for bidding in 1992. Units 45 and 46 were not available for bidding in 1992. Units 47 and 48 were not available for bidding in 1992. Units 49 and 50 were not available for bidding in 1992. Units 51 and 52 were not available for bidding in 1992. Units 53 and 54 were not available for bidding in 1992. Units 55 and 56 were not available for bidding in 1992. Units 57 and 58 were not available for bidding in 1992. Units 59 and 60 were not available for bidding in 1992. Units 61 and 62 were not available for bidding in 1992. Units 63 and 64 were not available for bidding in 1992. Units 65 and 66 were not available for bidding in 1992. Units 67 and 68 were not available for bidding in 1992. Units 69 and 70 were not available for bidding in 1992. Units 71 and 72 were not available for bidding in 1992. Units 73 and 74 were not available for bidding in 1992. Units 75 and 76 were not available for bidding in 1992. Units 77 and 78 were not available for bidding in 1992. Units 79 and 80 were not available for bidding in 1992. Units 81 and 82 were not available for bidding in 1992. Units 83 and 84 were not available for bidding in 1992. Units 85 and 86 were not available for bidding in 1992. Units 87 and 88 were not available for bidding in 1992. Units 89 and 90 were not available for bidding in 1992. Units 91 and 92 were not available for bidding in 1992. Units 93 and 94 were not available for bidding in 1992. Units 95 and 96 were not available for bidding in 1992. Units 97 and 98 were not available for bidding in 1992. Units 99 and 100 were not available for bidding in 1992. Units 101 and 102 were not available for bidding in 1992. Units 103 and 104 were not available for bidding in 1992. 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¹Source: Bartlett et al. (1993, Table C).
²Adjusted from the 1990 McGraw-Hill cost estimation by an average inflation rate of 3%.

Total grazing costs on McGregor Range were estimated to average less than similar costs estimated by Bartlett et al. (1993) for private leased land and BLM land in New Mexico. Updated to 1992, total grazing costs on McGregor were estimated to be \$16.78/AUM, with the nonfee cost component making up 71% of this total. By comparison, private leased land had an average total of \$25.53/AUM in 1991 and \$29.92/AUM in 1992.



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Travel costs to and from McGregor Range were substantially higher than for leasing comparable private and public lands. Most ranchers leasing the McGregor Range travel long distances to transport and care for cattle while on the bombing range. However, because BLM provides water, fencing, and improvements that are typically provided and maintained by ranchers leasing BLM and USFS lands, and because ranchers do not have to buy the grazing permit to use McGregor Range, grazing costs for McGregor Range were less in total.

The implied value of public land forage from comparing total grazing costs on McGregor Range with total costs on BLM land would be negative, because grazing costs were higher on BLM land even with no grazing fee and excluding permit investment cost. This same negative forage value was estimated by Bartlett et al. (1993) for USFS cattle and sheep producers, and for sheep producers grazing BLM lands. It was concluded that many public land ranchers have been willing to pay more in total to graze public lands than the apparent value implied from the private forage market. The total cost approach provides inconsistent results (Bartlett et al., 1993). The comparison of total grazing costs on McGregor Range with grazing costs on BLM lands made here supports this conclusion. Yet, it also highlights the importance of not comparing private lease rates with the federal grazing fee to imply value. Private lease rates are substantially higher on public lands and accounting for this difference greatly alters the conclusions that will be reached.

Bartlett, E. T., N. Pumber, L. A. Torelli, L. W. Van Tassel, J. De Villbiss, R.

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JOURNAL OF RANGE MANAGEMENT 47(2), March 1994

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Income Multipliers in Economic Impact Analysis

Flow of Money and Leverages

In the economic realm, money flows freely in an economy such as New Mexico's. The money also moves into other states that supply some of New Mexico's needs and in turn buy much of New Mexico's product. Imagine new money moving to New Mexico, an investment being brought to the state for economic development.

Someone asks, "What is the impact of this development on the economy of our state?" The answer lies in the multiplier, which indicates the total impact on income or business activity that results from this initial investment. This concept is similar to "How much benefit can the farmer get from the water?" Both questions depend upon how great the leakages (largely expenditures outside the state) are and how much benefit is realized before disappearance is total. We cannot produce all that we need or desire within the state, and it is to our economic advantage to trade our products and services for those produced elsewhere. So what is the multiplier?

Myth 1

An industry takes one dollar of raw product, and by changing it to the form demanded by the homemaker, adds value through processing, transporting to a convenient purchase point, and having the finished product available when desired. The raw product (food in this example) is brought in from the fields, transported to town, washed, inspected, graded, cooked, packaged, frozen, delivered to storage points and on to supermarkets, and eventually bought by the consumer. In this time, the market has spent more than a dollar improving and converting a dollar's worth of raw materials into a finished product. When the product is delivered at the proper time and place, a housewife pays \$5.00 for all the services included in the finished good. Is this an income multiplier of 8 where one dollar created eight? NO!

Determining economic benefits from increased local expenditures caused by development is important. Accurate assessment of increased incomes in the community is necessary in order to compare benefits with costs. Income multipliers are often used in this situation. This circular is written to acquaint the reader with the use of multipliers and to give some indication of the probable magnitude of these income multipliers. In most cases, a multiplier will be less than 2.

Picture a desert. Hot, dusty, and dry—no rain for six months. Out of a distant mountain range flows a stream, from which farmers irrigate their crops, water their cattle, and wash their clothes—they may even drink it, but not necessarily in that order.

The farmer struggles to use the water to the greatest benefit. There never seems to be enough. Evaporation takes a heavy toll, and leakages from the system claim much.

If the farmer could control the water, he could receive much more benefit from it. But the point is the water flows freely and the irrigator cannot capture all of it. The thirsty land competes with a hot sun, which reduces the farmer's available water. Even if dams were built, leakages (both evaporation and seepage) would still take a heavy toll.



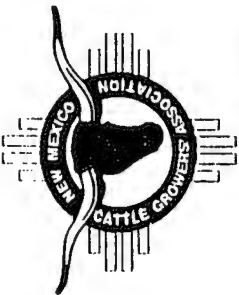
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Income Multipliers in Economic Impact Analysis



COOPERATIVE EXTENSION SERVICE

Las Cruces, New Mexico



New Mexico Cattle Growers' Association

2231 RIO GRANDE BLVD., N.W. • BOX 7517
TELEPHONE (505) 247-0584
ALBUQUERQUE, NEW MEXICO 87104

GB Oliver III
Western Bank
Alamogordo, New Mexico

Dear GB:

I wish I could be at the meeting with Senator Domenici to speak on behalf of New Mexico Cattle Growers' Assoc. Since I cannot, I would like for you to give the Senator my thanks for being there to hear our concerns and possibly relay to him some or all of my suggestions and concerns.

Please tell the Senator that I am deeply disturbed by the idea of expanding McGregor Range to the top of Otero Mesa and the resulting damage and disruptions that will result from such a needless expansion. The establishment of targets and increased low level flight patterns for this and the similar proposal to add more low level continuous German Air Force flights and training over the area are too much to ask of the people and the land. I am extremely opposed to both projects. The resulting damage to the land, the people and the community that exists in the affected area is not justified. Although the increased expenditure of federal dollars appeals to economic greed I believe the damage done will outweigh any increases in business activity in ways that cannot be measured or valued by traditional methods.

Another point that is crucial for Senator Domenici to be reminded of is the sorry history of the way that so many families in this area have already been treated. As you know, it is shameful the way that many patriotic Americans were ripped from their ranches and never fairly compensated in this area of New Mexico. Many of the families in the affected area are related to, or close to, the same ranch families that were dislocated in the 1940's and 1950's in the same region of New Mexico. It is unreasonable and unconscionable to hurt the same families and same communities again. Enough is enough. It is time for a leader of courage and wisdom to stand up and say, "NO MORE, use what you already have". GB please tell the Senator that I am sure there is no reason that the over three million acres already available cannot be used in conjunction with Melrose and other existing areas to accomplish whatever the military or security need is. Urban residents would not tolerate it if they had the disruption and damage this will cause imposed on them.

Ranchers are, and always have been, very patriotic and supported our military.



BILL HUMPHRIES
PRESIDENT
LINCOLN, NM

AL SCHMERBERGER
EXECUTIVE DIRECTOR
ALBUQUERQUE, NM

BOB FROST
FIRST VICE PRESIDENT
SAN JON, NM

JIMMY R. BASON
VICE PRESIDENT
HILLSBORO, NM

STELLA MONTANA
VICE PRESIDENT
LA PLATA, NM

CARL JANE, JR.
VICE PRESIDENT
TATUM, NM

RUSTY TANNIN
VICE PRESIDENT
BELL RANCH, NM

PAUCE WILSON
SECRETARY
ROY, NM

We understand and believe in the need for a strong national defense and always have tried to cooperate when given a fair deal. These additional burdens and takings are not a fair deal and should be dropped. I am sure solutions can be worked out within the existing areas the military already has. I hope that Senator Domenici will make sure that no more harm comes to those ranch families in the areas surrounding the existing ranges, they have already given and paid quite enough. Thank you for all of your hard work and please call me if I can be of any assistance.

Sincerely,

Bill Humphries
Bill Humphries

cc. Senator Domenici

Annotated Bibliography

Medical Effects of Environmental Noise

Medical Effect of Noise

Griffiths, D.: *Review of Community Response to Noise, Integration of Multiple Aircraft Noise Exposures Over Time by Residents Living Near U.S. Air Force Bases*, The Fourth International Congress on Noise as a Public Health Problem, Turin, Italy, pp 1031-1048, 1983.

Stephens, D.C., Powell, C.A.: *Human Response to Aircraft and Other Noise Events*, The Fourth International Congress on Noise as a Public Health Problem, Turin, Italy, pp 1061-1072, 1983.

Fidel, Sanford: *Speech Interference and Community Annoyance*, in Community Noise, Peppin, RJ & Rodman, CW (ed), American Society for Testing & Materials, Philadelphia, pp 80-86, 1979.

U.S. Environmental Protection Agency, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, 1974.

Richards, E.I., Ollerhead, J.B.: *Noise Burden Factor - New Way of Rating Airport Noise*, Sound and Vibration, V. 7, No. 12, December 1973.

Kryter, Kari D.: *The Effects of Noise on Man*, New York, Academic Press, 1970.

Great Britain Committee on the Problem of Noise, *Noise, Final Report*, Presented to Parliament by the Lord Minister for Science by Command of Her Majesty, London, H. M. Stationery Office, July 1963.

Summary: (1) Aircraft peak dBA: Annoyance is greater with 80 dBA directly overhead than off to one side. Annoyance increases directly with higher dBA.

(2) Aircraft Ldn: 50-60% extremely annoyed at 65 dBA, above 75 dBA annoyance approaches 100%. Aircraft noise is more bothersome than same level of road traffic noise, with a differential of 8 dBA at Ldn 55 and 15 dBA at Ldn 65. This probably relates to intermittency, louder peak dBA, and psychologic factors associated with aviation noise. Aircraft noise annoyance is associated with fear of the following: crash, air pollution, vibration, and loss of control. People don't habituate to this noise or fears even after two years. Annoyance with aviation noise is greater with jet compared to propeller driven aircraft, at night compared to day, and in quiet rural areas compared to areas with higher ambient noise. At Ldn 65, one study showed 60% fear reactions, 25% disturbed conversation, 15% sleep disruption, and 10% occupation interference. Another study at Ldn 65 showed a 45% occurrence of startle reaction, wakeup from sleep, and house vibration, 40% conversation disruption, and 25% inability to fall asleep. People rate an area as "unacceptable for residential living" in aircraft noise zones at 30% with Ldn 65, 65% with Ldn 75, and 90% with Ldn 85. The FAA and USAF both recommend no residential construction where Ldn exceeds 74 dBA and only under special circumstances when Ldn exceeds 64 dBA. The EPA recommends an outdoor Ldn = 55 dBA and indoor Ldn = 45 dBA to avoid interference with activities and have found severe complaints and litigations occurring when Ldn exceeds 60-65 dBA.

Startle Reactions

Sprang, M.: *Effects of Noise From Low-level Flights On Humans*. In Berglund B, Lindvall T (eds): *Noise as a Public Health Problem*, New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, 1988), Swedish Council for Building Research, Stockholm, pp 293-304, 1990.

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Jeanne Rosenberg, MD: *Jets Over Labrador And Quebec: Noise Effects On Human Health*. Can Med Assoc J 144:869, 1991.

Task Force on the Health Effects of Increased Flying Activity in the Labrador Area: *Final Report*. Can Public Health Assoc, Ottawa, 1987.

J. Steven Newman, Kristy R. Beattie: *Aviation Noise Effects*, Federal Aviation Administration, Report No. FAA-EE-85-2, 1985.

Noise Effects Handbook, A Desk Reference to Health and Welfare Effects of Noise, Office of the Scientific Assistant, Office of Noise Abatement and Control, U.S. Environmental Protection Agency, 1981.

Kryter, K.: *Physiological, Psychological, and Social Effects of Noise* (pub 1115), National Aeronautics and Space Administration, Washington, 1984.

Summary: Noise from aircraft operations can negatively effect the health of all people exposed to it. Impacts may include annoyance, fear, anxiety, anger, startle reactions, a sense of loss of control, pediatric behavior problems, psychiatric disorders necessitating hospitalization, sleep disturbance, speech and communication interference, performance interference, temporary and permanent hearing loss, increased utilization of medical services and medications, hypertension, and increased mortality rates.

Annoyance

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Nixon CW, Hills HK, Sommer EC et al: *Sonic Booms Resulting from Extremely Low-Altitude Supersonic Flight: Measurements and Observations on Houses, Livestock and People*. Aerospace Medical Research Laboratories, Wright Patterson Air Force Base, Ohio, 1968.

Summary: When exposed to loud peak dBA from low aircraft overflight or sonic booms, startle reactions frequently occur. When exposed to peak dBA in the 100-113 range, researchers measured increases in heart rate and avoidance behavior in subjects. There was no habituation to these effects over three days of study.

Loss of Control

Lundberg U, Fränkenhauser M: *Psychophysiological Reaction To Noise As Modified By Personal Control Over Noise Intensity*. Biol Psychol, 6:51-59, 1978.

Singer JE, Aceti JB, Schaeffer ME: *Cognitive Changes From Noise Exposure*. In Berglund B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of proceedings of the 5th international congress on noise as a public health problem, held in Stockholm, Aug. 21-25, 1988), Swedish Council for Building Research, Stockholm, pp 401-410, 1990.

Bargen R: *Airspace Blues*. Airspace, Gabbs, Nev, p 424, 1989.

Summary: Study subjects who could chose the level of noise (70-105 dBA) had less subjective discomfort and lower excretion of cortisol and catecholamines during noise exposure. Another group demonstrated decreased performance and ability to make decisions during loud noise when they had no ability to stop the noise. Surveys show that loss of control over one's life is one of the most disturbing effects of low level military overflights and/or sonic booms on rural Americans.

Pediatrics Behavior

Goldman B, Sheshatshit, *Lebrador A Town Without Hope*. Can Med Assoc J, 141:602-605, 1989.

Barnis K: *Medizinische/psychosomatische Auswirkung von Tiefflugalarm*. In Kinder und Tiefflug. Dokumentation des Expertenforums zu den Auswirkungen des Tiefflugalarms auf Kinder, Bonn, June 12, pp 18-22, 1989.

Preuss S: *Militärischer Tiefflug Und Seine Psychischen Auswirkungen Auf Kinder*. In Kinder und Tiefflug. Dokumentation des Expertenforums zu den Auswirkungen des Tiefflugalarms auf Kinder, Bonn, June 12, pp 3-8, 1989.

Cutro I, Ising E: *Gerundete Auswirkung Des Militärischen Tiefflugalarms-vorsudie*. Umweltbundesamt, Berlin, 1988.

Summary: In Canada, Innu children are very distressed by low military jet overflights. In Germany extensive studies have revealed the following behavior associated with low overflights: terror, panic, screaming, freezing in place, palpitations, shaking, dizziness, bed

wetting, sleep disturbances, nail biting, anxiety, slowed motor response, elevation of blood pressure and blood cortisol levels. No habituation was observed. In one study, blood pressure and hormonal response occurred after just mentioning that a low flight was coming in those experienced to them.

Psychiatric

Kyter, KD: *Association of Heathrow Airport Noise with Psychiatric Admission*, Psychol Med 20:1022, 1990.

Avey-Wickrama, I, et al: *Mental Hospital Admissions and Aircraft Noise*, Lancet 2:1275, 1969.

Summary: Two studies done around Heathrow Airport in London showed increased incidence of "nervous breakdowns" and admissions to psychiatric hospital in areas subjected to loud aircraft noise compared to those in quiet areas.

Sleep Disturbance

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LeVere T, Morlock G, Hart, F: *Waking Performance Decrements Following Minimal Sleep Description: The Effects of Habituation During Sleep*, Physiological Psychology, 3:147-174, 1975.

Noise Effects Handbook, A Desk Reference to Health and Welfare Effects of Noise. Office of the Scientific Assistant, Office of Noise Abatement and Control, U.S. Environmental Protection Agency, 1981.

Griefahn, B Muzet, A: *Noise Induced Sleep Disturbances and Their Effects on Health*. Institut pour l'Arbeits und Sozialmedizin, Universitaet Mainz, West Germany and Centre d'Etudes Bioclimatiques due CNRS, France.

Ohrstrom, E: *Primary and After Effects on Noise During Sleep With Reference to Noise Sensitivity And Habituation in Laboratory and Field*. In Berglund B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, 1:121, 1988).

Summary: Sleep can be disturbed in many ways by loud environmental noise. Single events of loud peak dBA are better predictors of disturbance than averaged values such as Leq and Ldn. Periodic noise is more disturbing than continuous noise. The indoor threshold is considered to be 35-40 dBA for falling to sleep, and arousal from deep (NREM - stage 4)

Medical Effect of Noise

sleep requires louder noise in the 70 dBA range. The usual cycles of sleep and EEG patterns are affected occasionally (10%) at 40 dBA and often (60%) at 70 dBA. Children are less susceptible and the elderly more susceptible to noise induced disturbances. These disruptions can lead to symptoms of fatigue, lethargy, decreased efficiency, anxiety, desiring to be left alone, and can lead to health disorders or interfere with convalescence from illness.

Speech Interference

Cohen, A: *Effects of Noise on Task Performance*. J Safety Res, 8:146, 1976.

US Air Force. *Design Note 3F1*. January 1974.

Summary: Speech interference will generally occur with background noise exceeding 60 dBA, especially when it exceeds 80 seconds/hour. The USAF has published a table of speech interference with noise and distance. It shows that background noise of 60-70 dBA will

VOICE LEVEL *	COMMUNICATION DISTANCE (meters)				
	0.5	1	2	3	4
Normal Voice (in dB)	72	66	60	56	54
Raised Voice (in dB)	76	72	66	62	60
					52
					58

Steady A-weighted sound levels that allow communication with 95 percent sentence intelligibility over various distances outdoors for different voice levels

* Assumes normal voice level of 70 dB (67 dBA) or raised voice of 76 dB (73 dBA)

generally interfere with telephone usage and speech at a 3-6 foot distance.

Performance Interference

Miller JP: *The Effect of Noise on People*. J Acoust Soc Am, 56:729-764, 1974.

Harris CS: *The Effects of Different Types of Acoustic Stimulation on Performance*, in *Proceedings of the International Congress of Noise as Public Health Problem*, Dubrovnik, Yugoslavia, May, pp 398-407, 1973.

Gulian E: *Noise as an Occupational Hazard: Effects on Performance Level and Health-A Survey of Findings in the European Literature*, May 20, 1974.

Glass DC, Singer JE: *Urban Stress Experiments on Noise and Social Stressors*, Academic Press, New York, 1972.

Medical Effect of Noise

Summary: As noise increases, both reaction time and number of errors increase, especially for more complex tasks. These effects are seen at continuous levels above 90 dBA or at lower levels that have a high frequency component (jet engine), intermittency, unexpected, or uncontrollable. These performance effects may last after the noise stops especially when the noise source is unpredictable or uncontrollable.

Noise Induced Hearing Damage

Spreng, M: *Effects of Noise From Low-level Flights on Humans*. In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, 1988), Swedish Council for Building Research, Stockholm, pp 293-304, 1990.

Laroche C, Heu R, Poiner S: *The Growth and Recovery From ITS in Human Subjects Exposed to Impact Noise*. J Acoust Soc Am, 85:1681-1690, 1989.

Wu Y, Liu X, Wang B, Wang, X: *Aircraft Noise-Induced Temporary Threshold Shift*, Aviation, Space, and Environmental Medicine, 60:268-70, 1989.

Lipscombe, D: *Considerations of Community Noise Impact on Hearing Health*, in *Community Noise*, Peppin, RJ & Rodman, CW (ed), American Society for Testing & Materials, Philadelphia, pp 73-79, 1979.

U.S. Environmental Protection Agency, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, 1974.

U.S. Air Force. *Design Note 3F1*, January, 1974.

Merluzzi F, Orsini S, Dighera A: *The Risk of Occupational Hearing Loss to Airport Workers*, In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, p53, 1988).

Summary: Exposure to loud noise, either periodic or continuous can produce a temporary threshold shift (TTS). With further exposure a permanent noise induced hearing loss (NIHL) occurs. Thresholds have been measured in various circumstances: 105 dBA for multiple single aircraft overflights or 115 dBA for a single overflight in a day, 102 dBA for impulse noise and 107 dBA for steady noise. Several studies have shown that aircrew or airport workers can have TTS with short exposures to 117-128 dBA and NIHL with 10 years of exposure in the 86-92 dBA range during an eight hour work day. The USAF set work place noise exposure standard at 30 min for 100 dBA, 13 min for 105 dBA, 5 min for 110 dBA, and 2.2 min for 115 dBA. When referring to averaged noise measures, experimental data suggests a threshold at $Leq = 70$ dBA and the EPA has adapted this value as a level of protection with a margin of safety.

Medication Usage

Knipschild P, Oudshoorn N: *Medical Effects Of Aircraft Noise: Drug Survey*. Int Arch Occup Environ Health, 40:197-200, 1977.

Kryter K: *Physiological, Psychological, and Social Effects of Noise* (pub 1115), National Aeronautics and Space Administration, Washington, p380, 1984.

Summary: A study in one community showed that the use of prescription drugs for sedatives, hypnotics, antacids, and antihypertensives increased significantly after opening a runway that resulted in loud aircraft overflight. In general the physiologic and psychologic responses to loud environmental noise increase requirements for medical care and medications.

Hypertension

Westman JC, Walters JR: *Noise And Stress: A Comprehensive Approach*. Environ Health Perspect, 41:291-309 1981.

Ising H, Michalak R: *Effects Of Noise From Military Low-Level Flights On Humans [part III]*. In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, 1988), Swedish Council for Building Research, Stockholm, pp 305-314, 1990.

Lennart A, Eggertsen R, Svensson A: *Noise And Essential Hypertension*. In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, p 83, 1988.

Ising H, Spreng M: *Effects of Noise From Military Low-Level Flights on Humans*. In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, p 84, 1988.

Suvorov GA: *Extra-Aural Effects of Noise*. In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, p 84-5, 1988.

Miljkovic-Kraus S: *Effects of Noise on Blood Pressure*. In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, p 93, 1988.

Summary: Experimental studies have shown: (1) increases of systolic and diastolic blood pressure with exposure to 85 dBA for 8 hours; (2) increases of blood pressure and blood cortisol during playback of military jet overflights with 100-125 dBA. In patients with essential hypertension, exposure to noise at 105 dBA for 30 min further increased blood pressure and peripheral vascular resistance. Epidemiologic studies have shown elevated blood

pressure and hearing loss in many of 433 children exposed to military jet overflights at 75 meters compared to controls. 85 workers exposed to 85 dBA showed elevations of systolic and diastolic pressures compared to age matched controls not exposed. A review of 40 studies showed a consistent correlation of prolonged high intensity industrial noise and hypertension.

Mortality

Meecham WC, Shaw NA: *Increase in Disease Mortality Rates Due to Aircraft Noise*. In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem*. New Advances in Noise Research (vol I of Proceedings of the 5th International Congress on Noise as a Public Health Problem, held in Stockholm Aug. 21-25, vol 3:351-356, 1988.

Summary: A study in the Los Angeles area using US Census and LA Department of Health Mortality Tapes showed an overall 5% increased mortality in a group of 100,000 exposed to LAX airport noise (Ldn 65) compared to a demographically matched control group in a quieter area. Mortality was most elevated in the age group 75 yr., especially from cardiovascular causes.



COUNTY OF OTERO
1000 NEW YORK AVENUE, ROOM 101
ALAMOGORDO, NEW MEXICO 88310-8235

April 2, 1997

Mike Dalby
Chamber of Commerce
1301 N. White Sands Blvd.
Alamogordo, NM 88310

Dear Mr. Dalby:

Because of some misunderstanding on the County's position, we would like to clarify and restate our position.

The Otero County Commission, in a meeting on April 1, 1997, unanimously approved the support of the development of the United States Air Force Tactical Target Bombing Complex to be located on McGregor Range.

The Commission has been working for some time with the Bureau of Land Management, the Public Land Use Advisory Committee, area ranchers, and other interested parties in an attempt to maximize the beneficial use of the county's land resources.

We have stated in letters sent to our Congressional Delegation in Washington that our first choice for the proposed Tactical Target Bombing Complex is the area recommended by the United States Air Force as Option Two. This area is south of County Road 506 and west of Otero Mesa. We believe that if Option Number One, which is recommended by the Air Force, is selected that opposition from some concerned groups might delay this project. Our area ranchers are very concerned with the low level bombing runs that are flying over or near their ranch headquarters. We are aware that Air Force officials are attempting to resolve this sensitive issue. The U.S. Air Force has pledged their efforts to work with all concerned parties in an attempt to mitigate these concerns.

We are fully aware of the important part the military plays in the economic well being of Otero County. We are totally committed to maintaining a strong national defense. The addition of the U.S. Air Force to have their own bombing range will ensure that our Air Force is able to maintain their combat readiness.

We are committed to the development of the Tactical Target Bombing Complex. We are aware that an additional thirty Tornado aircraft and approximately 900 to 1500 personnel will positively effect our county. We have also been informed that approximately \$100,000,000 could be spent in new housing and other facilities to support this expanded mission. This new construction and added personnel into our communities will add to our economic development with additional employment opportunities.

Sincerely,

Ronny Rardin
Otero County Commission Chairman



cc: Harold O'dell, Committee of 50; Tim Murphy, BLM; Brigadier General Larsen, Holloman AFB



COUNTY OF OTERO
1000 NEW YORK AVENUE, ROOM 101
ALAMOGORDO, NEW MEXICO 88310-8235

July 11, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

RE: Proposed Expansion of the German Air Force Operations at Holloman AFB, NM
(Final Environmental Impact Statement)

Dear Ms. Parker:

All three commissioners will be out of town on business, and I have delegated Mike Nivison to state Otero County's position. I thank you for allowing us time to speak and I apologize for any inconvenience.

As stated before the Otero County Commissioners would like to comment on pages ES-2. We strongly support the Tularosa Basin portion of McGregor Range, as we feel from our cumulative information that this is acceptable to the county. We, the Otero County Board of Commissioners, cannot support the other two options.

I would also like to submit a list of concerns regarding the NEPA process. If you have any questions, Mike Nivison will be glad to answer your questions in full. A letter will be forthcoming.

Sincerely,

Ronny Rardin
Otero County Commission Chairman



File copy
Copy hand del. by
Mike Nivison

SOUTHWEST RANGES (AREAS)

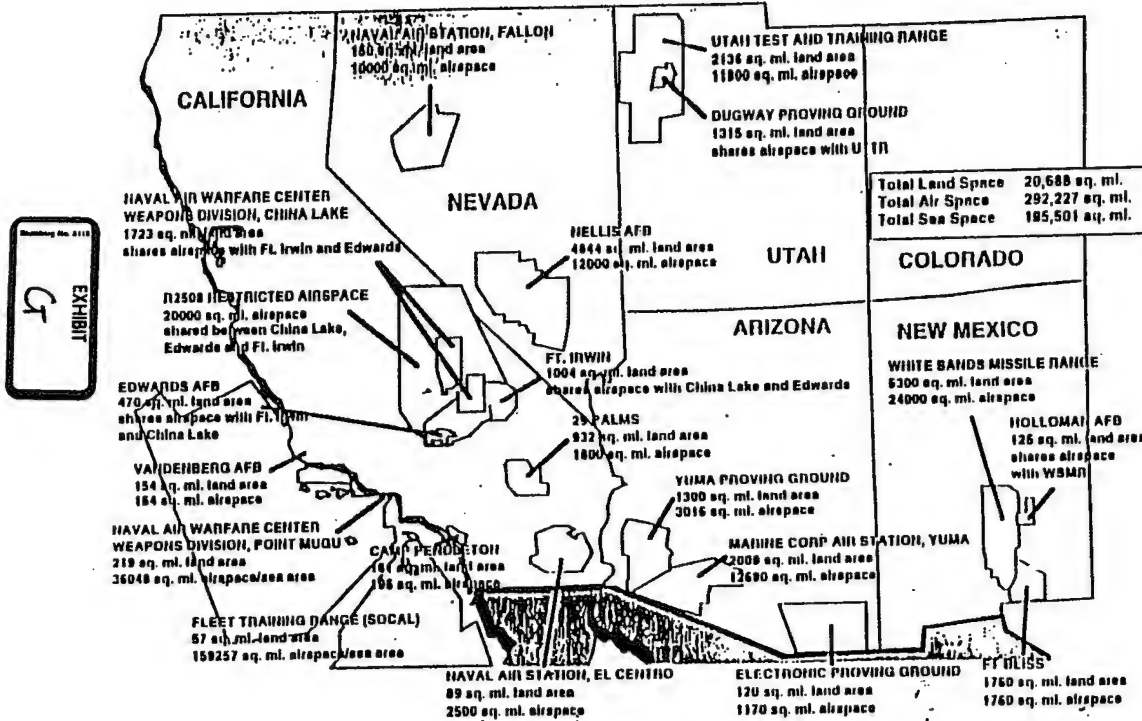


Figure 3

Proposed Expansion of the German Air Force Operations at Holloman AFB, NM Page 2 of 2

The proposed expansion of German Air Force operations at Holloman AFB, NM falls under the authority of National Environmental Policy Act (NEPA) Public Law 91-190, 1969

Sec. 1501.5

Where appropriate the lead agency should seek the cooperation of state or local agencies of similar qualifications. (Otero County is significantly effected, and has requested involvement with no response)

Sec. 1501.2

Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process to head off potential conflicts.

1. Otero County is not on the list of Personal Communication.
2. Otero County is not on the mailing list. (Had to request a copy of draft EIS)
3. No substance of the Custom and Culture Documents from Otero County, that we delivered to the Air Force, were considered.
4. No Otero County Public Land Use Plan or Ordinance were considered, or requested.
5. PLUAC was given a verbal report in September of 1996. It was reported that information was too preliminary, and we would receive a comprehensive update in November 1996. Nothing has been forthcoming.
6. In a separate meeting with Senator Dominici, Senator Bingaman, and Congressman Skeen, the Air Force was asked to work with Otero County. Otero County has waited in good faith, and has not been contacted by phone, in person, or by correspondence, and yet you publish a Draft EIS.

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Broken Silence

Noisy battleground: Environmentalists fume over disturbances from tranquility. All in a day's work, military says.

By DEBORAH SULLIVAN
The Desert Sun

In Joshua Tree National Park, primeval wilderness collides with the world of high-tech warfare every day.

Hikers and other park visitors seeking solitude instead are startled by jet fighters screaming down a training route just hundreds of feet above their heads.

"You're hitting up there in the park and all of a sudden, wham! You're hit by this wall of noise as you go by at low altitudes," said Ron Taylor, the conservation chairperson for the Tahquitz group of the Sierra Club. "Surely it's not an appropriate use of a national park."

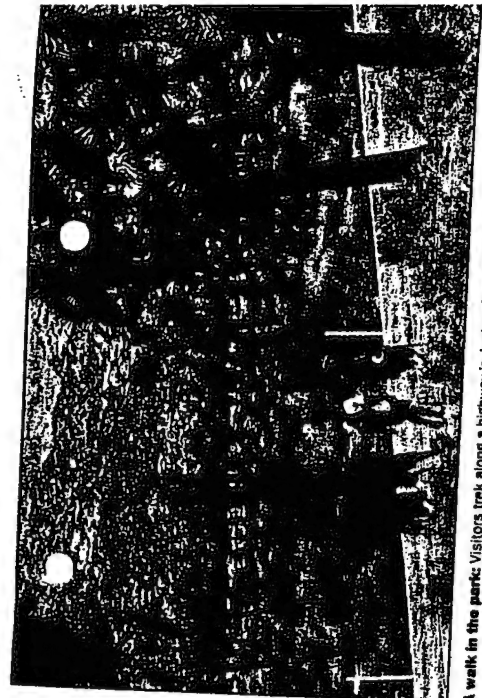
The visual training route that traverses the park from west to east belongs to Naval Air Station near Fresno, and was established in the 1970s, said park biologist Gillian Bowser.

Anyone Palms Marine Corps Ground Combat Center, March Air Force Base, and military bases in Torrey, Miramar and Yuma, California, the military's right to the route is guaranteed by the 1909 National Antiquities Act, which established Joshua Tree's status from national park to national park.

Over the years, the routes were closed many years ago over incipient or sparsely inhabited areas, so it wouldn't bother people, said Lemore public information officer Dennis McGrath. "But it's not a bother to people."

The route's path over the park affects the highest number of the park's more than 150,000 visitors a year.

See FLYZONE/84

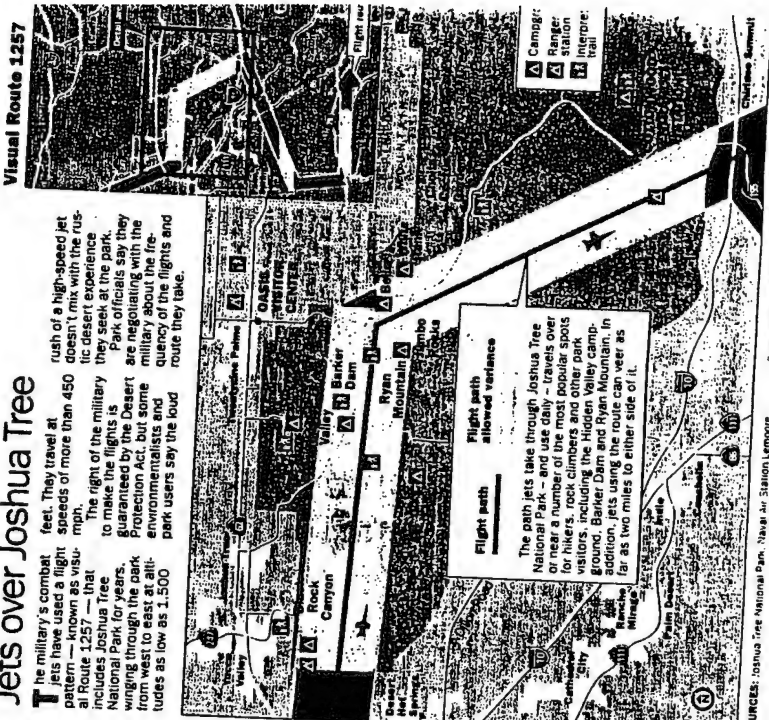


A walk in the park: Visitors trek along a highway in Joshua Tree National Park.

Jets over Joshua Tree

The military's combat jets have used a flight pattern — known as visual Route 1257 — that includes Joshua Tree National Park for years, warring through the park from west to east at altitudes as low as 1,500 feet. They travel at speeds of more than 450 mph.

The right of the military to make the flights is guaranteed by the Desert Protection Act, but some environmentalists and park users say the loud route they take.



SOURCE: Joshua Tree National Park, Naval Air Station, Lemore.

FLY ZONE

Continued from B1

More than a million annual visitors enjoy major scenic campground and scenic point in the park," said park Superintendent Dennis McGrath. "It couldn't be a worse location for a training route and on park visitors."

Negotiations

To ally that military park officials have met with Navy representatives to discuss possible compromise of the flight route.

The Naval Air Station has agreed as a courtesy to require flights to stay at least 1,500 feet over the mountain all the way through the park. A flight over the park takes less than 10 minutes.

It is unclear whether the Navy will negotiate the park changes to accommodate the park's officials' request that the Navy is not under legal obligation to change the route, so any changes are both hard-won and negotiable.

The California Desert Protection Act protects military overflights over the park. "So it's actually very nice of the military not to ask us about it, because they don't have to," said McGrath. "Nevertheless, negotiations are moving at a lumbering pace. It's kind of like trying to get a ball on a roller to turn on a dime," Bowser said. "They move around real slow."

Problems

National Park officials are quick to point out that the military is not responsible for nothing less than the weight of national security. And the air corridor crosses Joshua Tree National Park, a designated training route for higher planes and special training.

"Everyone has very sophisticated radar," McGrath said. "You must be able to see them. It's the only way you can train them."

The terrain through Joshua Tree is both safe and challenging enough for low-altitude training missions, Bowser said.

But the noise is a problem. The aircraft reach speeds of 450 to 550 mph and emit noise as high as 120 decibels. That's not loud enough to cause a sore throat, but loud enough to cause a headache, said McGrath.

From three feet away, the noise is louder than the park's ambient noise level of 15 to 20 decibels.

McGrath said the desert with its silence is a stark contrast to the noise of the military's training route. "It's a stark contrast to the silence of the desert," he said. "It's a stark contrast to the silence of the desert."

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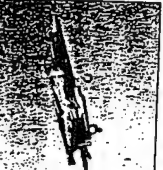
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Focus: En

Aircraft using the route

The flight route over Joshua Tree National Park is used by aircraft from all over the world. The route is used by aircraft from all over the world.



AV-8B Harrier II

Used primarily by Marine Corps Primary Flight School, which surface range is 2,100 miles. The aircraft is capable of more than 760 mph (Mach 1.1). Power plant: One turbofan engine. Crew: One. Due to low, depending on model of plane.

Used primarily by Air Force Guard and Reserve, Air Force Primary Flight School, which surface range is 2,100 miles. The aircraft is capable of more than 760 mph (Mach 1.1). Power plant: One turbofan engine. Crew: One. Due to low, depending on model of plane.



F-16 Falcon

Used primarily by Air Force Guard and Reserve, Air Force Primary Flight School, which surface range is 2,100 miles. The aircraft is capable of more than 760 mph (Mach 1.1). Power plant: One turbofan engine. Crew: One. Due to low, depending on model of plane.

Used primarily by Air Force Guard and Reserve, Air Force Primary Flight School, which surface range is 2,100 miles. The aircraft is capable of more than 760 mph (Mach 1.1). Power plant: One turbofan engine. Crew: One. Due to low, depending on model of plane.

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"You must stay low and fast. It's the only way you're going to survive."

— James McGrath, Lemore public information officer

ice have shown that low-flying aircraft have caused high-altitude sleep and an accelerated heart rate and blood pressure, according to a study by the U.S. Navy and possibly inspiring themselves.

Solutions

"The impact of the flights should be reduced by the military by directing flights to fly at 5,000 feet instead of 500 feet all the ground impact the park."

McGrath said the military's measures might be necessary to protect the park's solitude. That could mean further raising the height of flights, changing the times or frequency of flights, or changing the routes. "We're not sure what the military will do when many tourists are around," he said. "The actual route itself, however, will be changed. There are disagreements over all the routes, though, including the route south, which would be a minor major park visitor area while actually allowing military flights to fly lower than they did before — perhaps as close as 200 feet from the ground."

(fary bases across the Southwest.

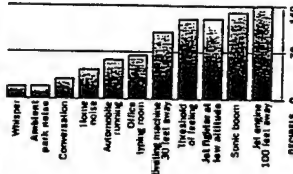


F/A-18 Hornet

Used primarily by: Navy and Marine Corps
Primary function: Multi-role attack and fighter aircraft
Range: More than 1,300 miles
Speed: Capable of more than 1,200 mph (Mach 1.7)
Power plant: Two turbofan engines
Crew: One to two, depending on the model of plane

The noise level

The noise from military aircraft that fly over Joshua Tree National Park can reach 120 decibels—louder than a car horn honked from three feet away.



No-fly zones

To avoid lat noise

- While the lines of antiquity are not available, the best way to avoid noise from military jets is to visit the areas of Joshua Tree National Park where they don't fly — most of which are also among the least-visited, most remote and inaccessible spots in the park:
- **Imperial Valley** in the eastern end of the park
 - **Coachella Valley** and the south of the Colorado Desert
 - **San Jacinto** and the southern portion of the park
 - **Indian Cove** on the park's northern boundary
 - **The Eagle Mountains** east of the Coltonwood entrance
 - **The Coachella Mountains** in the extreme eastern end of the park
- For more information, Joshua Tree National Park, 367-7511.
- Reviewed and rated by the author for this book.*

To comment

U.S. Rep. **Samy Benyamini**, D-Palm Springs, 324 Canyon House Bldg., Westwood, CO 80535, (702) 225-3330; 1555 E. First, Chino Hills, CA 91709, (909) 438-8885, 4401 W. 170th, Torrance, CA 90503, 3200 International District, Los Angeles, CA 90007, and email: benyamini@palmsprings.gov

U.S. Rep. **Jeffrey Lewis**, R-Westminster, 112 North Duke, Westminster, CO 80031, (702) 256-5081; or 1505 S. W. 10th, Pomona, CA 92464, CA 92373, (909) 793-5001

U.S. Sen. **Barbara Boxer**, D-Pomona, 112 Hill (Duking, Westminster, CO 80031, (702) 224-3553, or Imperial County, California, 2255 E. Imperial Avenue, Suite 545, El Segundo, CA 90245, (702) 816000, CA 91010, 140900, and email: boxer@senate.gov

U.S. Sen. **Dianne Feinstein**, D-San Francisco, 331 Hill (Duking, Westminster, CO 80031, (702) 224-3841, and email: feinstein@senate.gov

U.S. Rep. **John L. Amodeo**, R-Long Beach, 1000 Air Station Lane, CA



his own aerial view of the scenery at Joshua Tree National Park.

To the south

Anza-Borrego lives with banzal flights

WILSON, the Desert Fox, has been a fixture in the area for years. He has a reputation for being a "wild" man, but he is actually a very friendly and knowledgeable man. He has been a fixture in the area for years. He has a reputation for being a "wild" man, but he is actually a very friendly and knowledgeable man. He has been a fixture in the area for years. He has a reputation for being a "wild" man, but he is actually a very friendly and knowledgeable man.

much given to the conflicting needs of the military and civilians.

"It's designed to provide difficult terrain, but yet safety, and to go through the difficult areas," he said. "Civilians don't need much of that. If you move more than a few miles, you hit civilisation."

The portion of the flight path through the park is sandwiched between the military and the civilian populations, the Caspian Sea to the south and the Mergem Basin communities of Yucca Valley, Bill Yell and Twentynine Palms to the north.

Sgt. McGrath added, Lawson Naval Air Station has actively worked to create *avirium* initial conditions—no wind, no rain, no clouds, no birds—and could make changes again.

The base has reserved 100 acres for an endangered species of kangaroo rat, and a 100-acre buffer for migratory birds and bullfrogs. "We're not burrowing out affected by a dumping cloud on the base. And it has raised the height of the flight path of the training routes to avoid the glare and the civilian dwellings."

"We try, where and when we can, to do things for the environment," he said. "When there's been compelling reasons, we've been caged out."

[illegible][illegible]

THE GERMAN BOOK

... This need for the new bombing strategy... complex arises because of an agreement between the United States and Germany

With a group of 42 German attack aircraft shooting rockets and dropping incendiary bombs at mock targets on land south of Alamo Lake, the U.S. Air Force says it is testing the effectiveness of the new weapons.

The U.S. Air Force says no. In a draft copy of an environmental impact statement, it concludes that allowing the German air force to use an ecologically sensitive cattle-grazing area on McGregor Range for bombing practice "won't create much of an environmental disturbance at all."

That's not quite the answer you're looking for, though. The answer is that the law is based on a 1966 law that was passed by Congress and signed by President Lyndon B. Johnson. The law was passed in response to a report from the General Accounting Office (GAO) that the Bureau of Land Management (BLM) was not properly managing the public lands. The law required the BLM to develop a plan for managing the public lands and to report to Congress on the progress of the plan. The law also required the BLM to conduct a study of the public lands and to report to Congress on the results of the study. The law was passed in response to a report from the GAO that the BLM was not properly managing the public lands. The law required the BLM to develop a plan for managing the public lands and to report to Congress on the progress of the plan. The law also required the BLM to conduct a study of the public lands and to report to Congress on the results of the study.

Debate rages over German Air Force bomb training proposal

by Chuck Stocks

Carrizozo airport. According to Maness, "Private planes taking off and landing at the Carrizozo strip have been flown over; flown under and darn near flown through by Air Force training planes in the past. An additional thousand sorties a year by the German Air Force will just add to an already dangerous situation."

Maness says the flyover zone starts around Alpine, Texas, and goes past the Melrose Bombing Range and over to the Apache-Seagraves area in eastern Arizona. "In other words, their plan will affect the biggest part of the southern half of New Mexico and a large chunk of southwest Texas," he said.

the Richards Ranch outside Corona told the Air Force, "When you're flying 100 feet above the ground, you're going to shake something loose. In these old adobe houses, the noise and vibration from these low-flying planes shakes that plaster loose and causes cracking in the house."

U.S. Air Force training flights from Cannon, Kirland and Holloman Air Force bases have regularly overflown the Maness home for the past 30 years, and Maness blames these flights for the

Objections to the plan began last year in scoping hearings when Stephanie Hargrove, a representative of the Bureau of Land Management's district office in Las Cruces, told the military, "A bombing range of any scale is not appropriate for the Otero Mesa or the foothill/mountain portion of McGregor Range. We vigorously oppose the proposal."

★

collapse of a 60,000-gallon rock and masonry water storage tank on the ranch. "These low-flying jets startle our sheep and cattle. This causes them to run, knock down their lambs and calves and trample some of them. They'll run over each other, kill the little ones, and some of the sheep flip over on their backs and die," he said.

Around 25 people attended the meeting at Carrizozo. Everyone who spoke was opposed to the flyovers. Residents of the town have other problems with the Air Force plans. The flight path goes east and west in front of the approach and departure of the

anchors, hunters, hikers, environmentalists, historians and the Bureau of Land Management have found themselves in agreement about one thing, if nothing else. This unlikely coalition has expressed opposition to the expansion of the Air Force's announced plan to provide the German Air Force with a base at Holloman Air Force Base at Alamogordo and a low-level bombing training area for its European-built Tornado strike fighter planes.

The proposed bombing area is situated on a relatively lush grassland called the Otero Mesa. This is a 271,000-acre portion of McGregor Range that is usually open to public access. The Otero Mesa on McGregor Range is used for grazing and is habitat for quail, antelope, deer, migratory raptors and prairie dogs.

The Air Force conducted public hearings for the Draft Environmental Impact Statement on expansion of German Air Force Operations at Holloman in early July at Alpine and Dell City, Texas, and Truth or Consequences, Fort Sumner, Carrizozo and Alamogordo, N.M. These widely scattered localities will be potentially affected by the flight patterns of the proposed flights of German training missions.

Ranchers whose operations are in the path of the low-flying bomb runs say their livestock operations will be disrupted, their homes and improvements damaged, and their daily personal lives will be hampered by the low-level flights of the German fighters over their homes and ranches.

According to sources at the meetings, from 400 to 1,000 sorties of the 450-mile-per-hour training flights are planned per year at altitudes as low as 100 feet above ground level.

At the Air Force hearing in Carrizozo, the military heard Corona rancher Lloyd Maness deliver a resolution opposing the Otero Mesa plan. The resolution was passed that same day by the N.M. Wool Growers at its annual meeting up the road in Ruidoso.

Maness, who with his wife Sue runs

buenas tardes



Erma Baldwin — A volunteer at the Alamogordo Senior Center since 1991, Erma takes care of the Meals on Wheels program.

Tonight

ArCrawl, a multi-gallery art opening, will be from 7:30 to 8 p.m., at the Ickinger Center. Copeland's Creative Designs and the Pottery Gallery. The public is invited to stop at each to view works and enjoy refreshments.

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Daily News

Alamogordo, New Mexico Vol. 99-No. 189

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Air Force continues to take comments

By SHARON ANDERSON

Daily News Staff Writer

The Air Force has agreed to accept additional public input, as well as to a meeting with state and county entities and a team of experts in an attempt to once and for all address the growing concerns about the proposed bombing target complex for the German Air Force.

About 40 people attended an informal invitation-only meeting Monday afternoon in the Otero County Commission chambers in an attempt to come to terms concerning the 500-plus page draft Environmental Impact Statement on the proposed expansion.

The public comment period on the draft expired Monday, Aug. 4, and Air Force representatives told those present there will be no extension of the period. Nor would the matter be reopened in any official capacity, said Col. Ron Obolencki of Air Space and Ranges Air Combat Command, Washington, D.C.

Even so, Obolencki said, comments from state and local agencies and the public in general will be accepted and taken to heart if they are received in time to do so.

"We will not ignore any relative input," Obolencki told those attending the meeting. As long as comments are submitted in writing before the end of August, he said, the Air Force should have ample time to consider them for inclusion in the final EIS.

Information contained in the final EIS will be used by the Secretary of the Air Force in establishing the bombing target area at one of the three optional locations.

Besides Obolencki and a handful of Air Force representatives from Washington

sioner, Ron Bardin, Alamogordo Mayor Don Carroll, Alamogordo Chamber of Commerce Executive Director Michael Dalby, Bureau of Land Management representatives, Holloman AFB officials and attorneys, State Sen. Dianna Duran, members of the Public Land Use Advisory Council, representatives of U.S. Rep. Joe Skeen's office, and at least one who was adamantly opposed to the military's expansion in general.

Obolencki agreed to have the Air Force consider the results of studies conducted at the request of Mike Nivison, the county's public land use planner, by state universities on the effects the bombing range might have on the lives and livelihood of locals.

At the next meeting, Nivison plans to have the head researchers on the studies explain their findings. They are Dr. John Fuller, head of New Mexico State University's Range Improvement Task Force, and Dr. Alex Thal, director of the Southwest Center for Resource Analysis at Western University.

The study shows all small ranches and most mid-sized operations in Otero County are at or below the break-even point, Nivison said. The effects of the increased air traffic at two of the proposed locations for the bombing complex might be

of a misunderstanding, the results of the studies were not included in the draft environmental impact survey (DEIS), Obolencki said. "I'm sorry," he said.

Commissioner Bardin told Obolencki he'd also like to see studies done to determine the impact the 1,500 or so additional Germans expected to accompany the 30 Tornado jets to Holloman would have on the local tax base and water supply.

Mayor Carroll said supplying water

should be no problem. According to studies already conducted by the city, Carroll said, the current system can accommodate 45,000 users. "I think there's sufficient water for 1,500 more people, so why do another water study?"

Anyone with comments regarding the proposed bombing range should send them to Stacy Parker at Headquarters Air Combat Command/CEVA, 129 Andrews St., Langley Air Force Base, Va., 23665-2769.



DOWN TO BUSINESS — Mike Nivison speaks in a range, as Col. Ron Obolencki looks on. Sharon Anderson/CN

German Maltese cross. Colonel Sovada will be reporting directly to superiors within his own nation's armed forces, with no American in his chain of command.

Chief Pentagon spokesman Kenneth Bacon told the press last year. "This should not be portrayed as a German invasion or occupation of U.S. space." At a news briefing, he insisted that "the Germans are tenants at Holloman Air Force Base, which continues to be a U.S. Air Force Base." The Deutsche Presse-Agentur, a German news agency, which does not have to concern itself with American public opinion, put a different spin on the story, saying, "The German and American defense ministers have christened a German military base in the southwestern U.S. desert, the first permanent military installation set up in the United States for a foreign nation."

Objections to the plan began last year in scoping hearings when Stephanie Hargrove, a representative of the Bureau of Land Management's district office in Las Cruces, told the military, "A bombing range of any scale is not appropriate for the Otero Mesa or the foothill/mountain portion of McGregor Range," she said. "We vigorously oppose the proposal."

She objected to the way the Air Force initially presented its plan to the public. She said it offered only vague proposals about the bombing range; had failed to identify alternative sites; and, because of that, had denied the public the opportunity to participate in the decision of where to situate the target site.

In last year's scoping hearings, Hargrove told the Air Force, "Because you have not presented your proposals or alternatives being considered to the public, you have denied the public the opportunity to participate and you have denied yourselves the opportunity to tap into the vast knowledge of the citizens of this state."

Further, she said, "The National Environment Policy Act was passed, in part, to give the public a say in what its government is doing. We at the BLM have a lot of experience in working with the public as part of the NEPA process."

Observers believe that Hargrove's insistence that the Air Force comply with the NEPA process forced the Air Force to conduct last month's hearings to listen to public comment and prepare an Environmental Impact Statement (EIS).

The Air Force's final environmental impact statement is due in November and a decision on the proposal is set for December.

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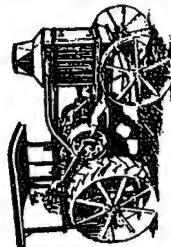
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Training vs. quality of life

Residents fight expansion plan

By Curran Nobel

St. Albans, N.H.

There is an area straddling Virginia and West Virginia that over the last few years has become known as the "No Significance" area, which officials confirmed the conclusion of the assessment.

In November 1998, the Air Force pulled the Virginia Department of Transportation and the West Virginia Department of Transportation to conduct an assessment of the area.

"Apparently the state points of contact didn't want to be involved in the assessment," said the Virginia Department of Transportation.

"It said the question period for the proposal was almost over, but this was the last time we could have heard anything about it."

At that point, according to the Virginia Department of Transportation, the assessment was already underway.

Bob Goodrich, the assessment's lead author, said the assessment was already underway.

"We began organizing rapidly," he said. "At that point, according to the Virginia Department of Transportation, the assessment was already underway."

Goodrich, along with Sen. John Warner, the Virginia Department of Transportation's chief of programs and legislative liaison, responded Feb. 4. He acknowledged that the Air Force's assessment was already underway.

But the assessment was addressing "average day-night equivalent sound level" with the split-second timing of the Air Force's assessment.

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Growing pains

Shown are the existing Evers Military Operations Area and the area after a proposed expansion. The expansion plans were withdrawn because of problems with an environmental-impact assessment, but the Air Force is preparing to conduct another impact study.



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of the assessment had a Ph.D. in ecology. He said he did not live the Evers area to talk to anyone who lived there. He said he was not a local resident.

And then there is the effect on people. "I was opposed to the increase in sound because of the sound barrier of Franklin, W.Va., a town of 314 in Pendleton County."

There was no discussion of potential impact on tourism, outdoor recreation or aesthetics, he said.

He said the main problem was that the assessment's noise evaluation in Evers would say "well within those levels acceptable for residential land use and other noise-impact guidelines."

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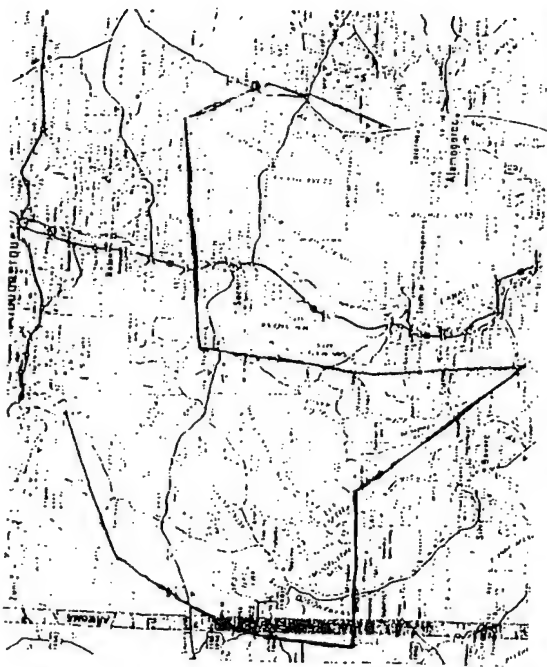
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Continued on B1 German flight training program by the German Air Force

length of VR 176's path.
Ray, a retired school teacher, a horse small town is located in southern Socorro County, said people in his area are largely opposed, due to noise.

In his letter, Ray wrote that Tornados "are exceptionally loud planes," producing an "LMA" (or the highest sound level measured during a single aircraft overflight of 122 at 100 feet).

"Any flight that low sounds like a definite roar," Ray said. "We now get flights not only from Holloman, but from Kirtland, Edwards, and other air force bases," Ray said, adding those flights are not low level.

"It seems to me that the peace and quiet of a community is valid as being an airspace. The flights will have an (negative) economic impact on this area. If this thing becomes really obnoxious."

Ranchers are also worried that low-level flights could affect milk production in cows, Ray said. Broadbent added that ranchers worry about time and deer might be affected.

Broadbent cited a Canadian documentary about how low-level jet flights in Newfoundland and Nova Scotia affected Caribou, breeding cycles and increased the suicide rate in certain Inuit tribes.

When asked about criticism of an expanded German flight training program, Cox said, "We've actively and aggressively sought out everybody's opinion, negative, positive or neutral, so those comments will be included in the final Environmental Impact Statement."

Silva sent back to prison

A Socorro man must serve time in prison after his probation was revoked recently in District Court. Charles Ruben Silva, 30, did not fulfill several conditions of his sentence, according to a report in his court file.

Judge Edmund Kase III went with recommendations by the adult probation office to revoke Silva's suspended sentence.

For Carjacking, adult probation officials estimate that Silva will serve 11 and a half months in prison. In 1984, Silva received five-year probation for eight petty misdemeanors.



SOCORRO MIDWEEK

Help for village park/P12

Defensor Chieftain

SOCORRO, NEW MEXICO • JULY 30, 1997

German flight plan criticized

Karen Van Splawn
A1 DEFENSOR CHIEFTAIN

A proposed flight training program over several counties, including Socorro, is being criticized by citizens.
According to a letter sent by residents of Raymont, five families and people will be affected at the German Air Force base, low level training flights, the U.S. Air Force's proposal for allowing the Germans to fly 100 feet or less above the ground. The flight could be as low as 100 feet, ground, said one official at Holloman Air Force Base, near Mesquite.

German planes and personnel have been stationed at Holloman for nearly one year, as part of an agreement between the United States and the Federal Republic of Germany.

Those opposed to low level flights want the public comment deadline extended 60 more days from the original one of Aug. 4, before any decisions are made.

Capt. Larry Cox of Holloman Air Force Base said this particular training flight program wouldn't begin until 1999.

Further Broadbent, a rancher who lives in Tular, said people should have been told about the proposal earlier.

"If you don't get enough people complaining, then this is policy."

Broadbent said "We in the ranching community do not want these (flight levels) to be lowered."

"Right now, we see a problem when a horse has been damaged, or livestock run into fences because they're scared (by jet noise)," he added.

Socorro County Commissioner Juan Gutierrez said Monday he's writing letters to New Mexico Congressional representatives, asking them to request an extension.

"I think it is a concern," Gutierrez added.

The German Air Force wants to conduct low level flights on a route known as VR 176.

Its route extends from outside of Holloman Air Force Base, in Otero

County, and runs up through Lincoln County. In the northern part of Socorro County, planes would fly between Socorro and Helen, then right above Magdalena and down over the Chiricahua National Forest.

The flight path also has jets passing through Sierra, Luna, Grant and Canon counties; VR 176 ends in southern Chiricahua County.

The German government could relocate 30 more of its Tornado aircraft to Holloman; right now there are only 12.

As another part of an expanded German training program, a new complex could be built in Otero County, within the Tularosa Basin portion of McGregor Range.

The German Air Force needs to

practice its low flying skills to avoid being seen by a potential adversary, Cox said.

Ray's letter states 1,211 sorties, or training flights, could be conducted by the Germans over VR 176 in one year.

That translates into four to five flights a day, Cox said, "but those flights would not be conducted every day of the week."

Cox said the number of aircraft is closer to 1,115. If the 30 additional Tornados are allowed at Holloman, there would be 1,187 sorties a year, he added.

Cox said VR 176 is, by no means, a new route. He added the Germans would not always fly the route.

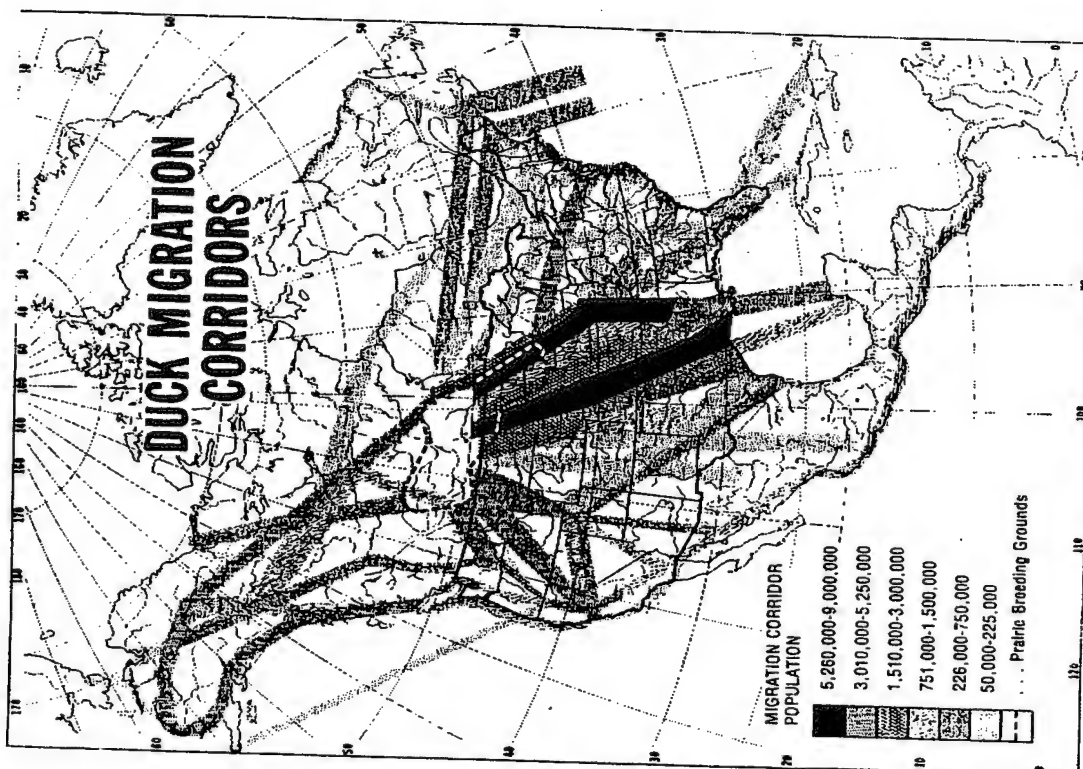
(Please see Page 3)

term "flyway" has long been used to designate the migration routes of birds. For management purposes, four

The term "flyway" has long been used to designate the migration routes of birds. For management purposes, four waterfowl flyways—Pacific, Central, Mississippi, and Atlantic—were established in the United States in 1948. To varying degrees the waterfowl populations using each of these flyways differ in abundance, species composition, migration pathways and breeding ground origin. There are differences, also, in levels of shooting pressure and harvest.

In 1952, Flyway Councils were formed in each of the four flyways. The Council in each flyway is made up of representatives from the wildlife agencies of the States in that flyway—one representative from each State. The Councils study flyway problems, develop waterfowl management recommendations, and generally work closely with the U.S. Fish and Wildlife Service in implementing waterfowl management and research programs.

There are some problems in matching waterfowl migration corridors with flyway boundaries because some species nest and winter in areas that do not occur along a north-south axis. These species cross flyway boundaries during migration. On balance, the present arrangement is useful in that it permits reasonable management of waterfowl. At some future time, it is possible that further rearrangement of boundaries may permit better management of the waterfowl resource.



OPTIONAL FORM 94 (7-83)

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EXHIBIT

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Sterna fuscata Pontopiddan

6: AE-pl 63; NW-pl 46; AM(IT)-94

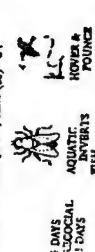


3-11 DAYS: APPRECIABLE DISCREPANCY
1-11 DAYS: DISCREPANCY
1-11 DAYS: DISCREPANCY

11-covered coasts, running, off along inland
unusually conspicuous; on ground, off
siding. NESTS: In sand, gravel, moss, or
if dry grass or shell. Eggs: Buff/olive/
died. 1.6" (4 mm). DIRT: Incl crusta-
ceans to chicks. Off lower before
2. CONSERVATION: Mostly pelagic in
the Atlantic. Millinery threat once
with Common and Aleutian Terns. Long-
term return to breeding colony. Long-
term attended 98% of time. Family remains
in daylight in both summer and winter
raisons. p. 183; Plum. Trade, p. 37; Site
i; Farney, p. 159. Ruffs: Cramp, 1985;

Sterna fuscata Gmelin

12-pl 68; NW-pl 41; AM (IT)-84



12-11 DAYS: APPRECIABLE DISCREPANCY
1-11 DAYS: DISCREPANCY
1-11 DAYS: DISCREPANCY

on grassy portions of islands and salt
flat; reproduce incl aerial displays and
with sand, shells, sticks, grass, off
with shells, grass, sedges; off un-
der (47 mm). DIRT: Mostly insects,
eggs, crustaceans; rarely bird eggs
for fish. CONSERVATION: Winters a
shelter, now mostly restricted to
ed by egg collection and plume trade
age. NORTS: In colonies or solitary,
Long-term pair bond. Site tenacity
avement increases through season.
2-3 months. Ute breeds at 5 years.
EASYS: Plum. Trade, p. 37; Vi-
Coloquial, p. 173; Site Tenacity;
Are, p. 555. Ruffs: Cramp, 1985;

Migration

The arrival of birds in the spring and their disappearance at the end of the breeding season is one of the most familiar aspects of North American bird biology. Seasonal migration enables birds to avoid the physiological stresses of unfavorable climates and to exploit food supplies that are available for only limited periods each year. Thus, many species can breed at high latitudes during the brief but insect-rich arctic summer, and then fly south to the more hospitable climate of the southern United States, Central America, or South America. While we may think of them as "our" birds that go south for the winter, it may be more logical to think of them as southern species that make a relatively brief foray north to breed.

Seasonal migration presumably evolved as a means of increasing lifetime reproductive output. It permits exploitation of areas that either are more productive or provide less competition than the wintering grounds. Moreover, daylight periods in spring and summer are longer at higher latitudes, resulting in more hours per day in which birds can gather food.

Preparation for migration involves both physiological and behavioral changes. Physiological preparation includes the accumulation of fat to provide fuel for prolonged flight. Not uncommonly, passerines lose one-fourth to one-half of their body weight during overwater migration. Behavioral changes are especially prominent in nocturnal migrants, which alter their activity rhythms during darkness and begin to preferentially orient in the direction that they will soon be flying.

Most long-distance migrants, especially smaller birds, fly at night; they may travel continuously or land daily around sunrise to rest and forage. When traveling over water or unsuitable habitats, birds that normally stop each day may fly without a break for longer periods. For example, Blackpoll Warblers migrate overland in spring, but autumn migrants travel nonstop over open ocean from southeastern Canada and the northeastern United States to their wintering grounds in northern South America. Migrants that move only relatively short distances within our region usually travel during the day, generally spending only a few hours of the morning in migration. Aerial foragers, such as swallows and swifts, do not stop but simply feed in flight as they are migrating.

Migration in North America is essentially north-south along four principal routes or "flyways": Pacific, Central, Mississippi, and Atlantic (see maps below). In Europe and Asia, some migration routes are oriented more east-west, although latitudinal change is still significant. About 150 species of land and freshwater birds that breed in our region winter to the south in Central and South America and the West Indies.

Different species characteristically migrate different distances between wintering and breeding areas. The Arctic Tern, as its name implies, breeds in the high Arctic, winters near the southern tip of South America and as far south as Antarctica. In contrast, Clark's Nutcracker often migrates only a

MIGRATION 111

EXHIBIT

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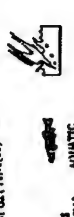
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Sterna dougalli Monagu

12-pl 68; NW-pl 41; AM(IT)-96



12-11 DAYS: APPRECIABLE DISCREPANCY
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siding. NESTS: In sand, gravel, moss, or
if dry grass or shell. Eggs: Buff/olive/
died. 1.6" (4 mm). DIRT: Incl crusta-
ceans to chicks. Off lower before
2. CONSERVATION: Mostly pelagic in
the Atlantic. Millinery threat once
with Common and Aleutian Terns. Long-
term return to breeding colony. Long-
term attended 98% of time. Family remains
in daylight in both summer and winter
raisons. p. 183; Plum. Trade, p. 37; Site
i; Farney, p. 159. Ruffs: Cramp, 1985;

Sterna fuscata Nuttall

12-pl 68; NW-pl 41; AM(IT)-96



12-11 DAYS: APPRECIABLE DISCREPANCY
1-11 DAYS: DISCREPANCY
1-11 DAYS: DISCREPANCY

on grassy portions of islands and salt
flat; reproduce incl aerial displays and
with sand, shells, sticks, grass, off
with shells, grass, sedges; off un-
der (47 mm). DIRT: Mostly insects,
eggs, crustaceans; rarely bird eggs
for fish. CONSERVATION: Winters a
shelter, now mostly restricted to
ed by egg collection and plume trade
age. NORTS: In colonies or solitary,
Long-term pair bond. Site tenacity
avement increases through season.
2-3 months. Ute breeds at 5 years.
EASYS: Plum. Trade, p. 37; Vi-
Coloquial, p. 173; Site Tenacity;
Are, p. 555. Ruffs: Cramp, 1985;

MIGRATION 112



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

MAR 3 1997

Honorable Rodney A. Coleman
Assistant Secretary of the Air Force
(Manpower, Reserve Affairs, Installations and Environment)
1660 Air Force Pentagon
Washington, D.C. 20330-1660

Dear Mr. Coleman:

Last summer the United States Air Force (USAF) at Holloman Air Force Base unveiled a plan to construct a new bombing range in southern New Mexico as a training facility for use by the German Air Force. The proposed location is on the Otero Mesa and Foothills portion of McGregor Range, an area under a term withdrawal which expires in the year 2001. The German Air Force has expressed the need for the new bombing range in 1999, a mere two years prior to the withdrawal expiration.

Public Law 99-606 (November 1986) provided the withdrawal of McGregor Range for military training purposes for only 15 years. The same law requires the Secretary of the Interior to manage the land under the auspices of the 1976 Federal Land Policy and Management Act (FLPMA). The Bureau of Land Management (BLM) is the agency which has managed the Otero Mesa and Foothills portion of McGregor Range in accordance with the multiple-use and public-use mandates of FLPMA.

Otero Mesa and Foothills area, which comprises 271,000 acres, is home to some of New Mexico's finest native grasslands and one of New Mexico's finest antelope herds. It has diverse plants and wildlife, healthy watersheds, minerals, cultural and paleontologic resources, and vast open spaces. The Culp Canyon Wilderness Study Area and four Black Gramma Areas of Critical Environmental Concern are special management areas located in the Otero Mesa and Foothills portion of McGregor Range. Livestock grazing in this area is also historically important and continues to be an important traditional social, functional, and economic use of the land. Hunting and wildlife watching are also historic public uses integral to the area. We strongly believe that the public interest is best served by BLM managing these important resource values and land uses under FLPMA.



2

The USAF is currently preparing an environmental impact statement on the proposal to construct the new bombing range. Its preferred alternative is to locate the bombing range on Otero Mesa and Foothills. Three other alternatives are also being evaluated: 1) a site on McGregor Range located off Otero Mesa in the area known as the Tularosa Basin, 2) existing bombing ranges, and 3) no action.

At this stage of the environmental impact statement process, the BLM and the Department of the Interior believe that either the Tularosa Basin, which has been used for previous military activities, or existing bombing ranges are better suited as the preferred alternative in lieu of the Otero Mesa and Foothills portion of McGregor Range. We do not believe that subjecting a high quality area such as the Otero Mesa and Foothills area to the impacts of military activities is appropriate when previously affected areas of lesser environmental sensitivity are available on the McGregor Range. Additionally, this position has widespread support from the elected officials in Otero County, the livestock industry, sportsmen, recreationists and the environmental community.

Clearly, if the objective is to site and construct a bombing range facility in the time frames required by the German Air Force, serious consideration should first be given to the alternative locations such as the Tularosa Basin or existing bombing ranges. For the reasons stated above, we believe it would be highly preferable and more expedient for the USAF to consider either of these options as the preferred alternative in the environmental impact statement.

If you have any questions regarding the Department of the Interior's position on this matter, please contact me at 202-208-5676 or Mike Pool of my staff at 202-208-3146.

Sincerely,

Bob Armstrong

Bob Armstrong
Assistant Secretary, Land
and Minerals Management

bcc: Secretary's S/N Secretary's RF(2) BLMWO100-Baca
BLMWO100-Millenbach BLMWO200-Sharpe BLMWO300-Tipton
ASLM Chron BLMNMLCDM-Rundell ASLM - deWITT

Copies Also Sent to the Addressees on the Attached List
ASLM:MPOOL.js:02/28/97:208-3146

coleman.ltr



MESCALERO Apache TRIBE

Wendell Chino, President
Mescalero, New Mexico 88340

August 29, 1997

U.S. Air Force
Headquarters Air Combat Command/CEVA
Attn: Cheryl Parker
11817 Canon Blvd., Suite 500
Newport News, Virginia 23606-2558

CERTIFIED - RETURN RECEIPT REQUESTED

Re: Draft EIS for the Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico.

Dear Ms. Parker:

On June 2, 1997, Mescalero Apache Tribal representatives met with representatives from Holloman AFB (HAFB) and Fort Bliss to discuss the proposed German Air Force Expansion. During that meeting Tribal representatives expressed concern over the potential negative impacts to cultural resources; particularly on or near Otero Mesa. The Tribe requested that Holloman AFB provide the Tribe with the cultural resources inventory that was conducted for the Draft EIS, so that this information could be reviewed and assessed by the Tribe prior to the Tribe's submittal of comments on the Draft EIS. The Tribe was assured by Mr. Martyn D. Tagg, HAFB Base Archaeologist, that this information would be provided. To date, the Tribe has not received any documentation from Holloman AFB regarding the cultural resources inventory. Needless to say, since the necessary information requested by the Tribe was not received the Tribe cannot adequately comment on the Draft EIS.

The area of concern falls within the traditional homelands of the Mescalero Apache, and was utilized by several other Apachean groups. Apache archaeological sites; a marked, but hidden spring, and an Apachean trail are known to exist in the proposed project area; specifically Otero Mesa; however the Draft EIS does not address these sites. This leads the Tribe to believe that the cultural resources inventory may be inadequate.

All archaeological sites pertaining to Native American peoples, whether Apache or non-Apache, are considered as revered places, as these are locations where people utilized a place or landscape for the production, reproduction, and maintenance of their social, technological, spiritual and political systems. Therefore, without the requested cultural resources information it is difficult to assess the impacts to the sites identified, and to comment on the National Register eligibility of those sites.

ATTACHMENT

Honorable Robert M. Walker
Assistant Secretary of the Army
for Installations, Logistics and Environment
Room 2E614
110 Army Pentagon
Washington, D.C. 20310-0110

MG Randolph W. House
Assistant Chief of Staff for Installations Management
Room 1E668
600 Army Pentagon
Washington, D.C. 20310-0600

General William W. Hartzog
Commanding General
U.S. Army Training and Doctrine Command
Ft. Monroe, VA 23651-5000

MG John Costello
Commanding General
U.S. Army Air Defense Artillery Center
and Ft. Bliss
Ft. Bliss, TX 79916-7001

LTG John P. Jumper
Deputy Chief of Staff for Air and Space Operations
HQ USAF/XO
1630 Air Force Pentagon
Washington, D.C. 20330-1630

General Richard E. Hawley
Air Combat Command/CC
205 Dodd Blvd, Ste. 100
Langley AFB, VA 23665-2788

BG Dennis R. Larsen
49th Fighter Wing/CC
490 First Street, Ste. 1700
Holloman AFB, NM 88330-8277

Honorable Sherri W. Goodman
Deputy Under Secretary of Defense
for Environmental Security
3400 Defense Pentagon
Washington, D.C. 20301-3400

It is the Tribe's position that No Action be taken on this proposed project until the request cultural resources inventory be reviewed and addressed by the Tribe. Furthermore, it is recommended that this letter be incorporated into the EIS, and remain in the document throughout the agency review process.

If you have any questions, please feel free to contact me at (505) 671-4711.

Sincerely,



Lisa M. Meyer
Tribal Historic Preservation Specialist

cc: Mr. Wendell Chino, President Mescalero Apache Tribe
Mr. Gregory M. Quinlan, Attorney at Law
Ms. Claudia Nissley, Native American Affairs Coordinator, Advisory Council on Historic Preservation
Dr. Lynne Sebastian, State Historic Preservation Officer

Dear Ms. Parker.

I am against the proposed use of low level German Tornado training flights on the VR-176 flight path. I view this as an outright sale of our peace and quiet and quality of life to foreigners. If this expansion goes through, it will have a very negative impact on people, livestock and wildlife in this area.

Sincerely,



(include address)

Box 170
Winston NM 87943

Anthony Sforza, M.D.
Family Medicine

HC-65, Box 21-B
915-364-2223

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

Alpine, Tx 79830
July 6, 1997

Dear Ms Parker:

The USAF in its "Proposed Airspace Modifications to Support Units at Holloman AFB, NM; Final Environmental Assessment; USAF Air Combat Command; June 9, 1997" has made numerous and intentional omissions and misrepresentations. The reason I say "intentional", is that many of these omissions and misrepresentations were presented to them in verbal communication at public meetings and in writing. In face of reasonable public objections they have issued a "Finding Of No Significant Impact", and plan not only to go ahead with this new program, but to expand it. Attached is a document presenting many (not all) of the intentional misrepresentations and omissions.

One way this can end in a win-win situation is to have the German Air Force (GAF) pay the full cost of opening up one of the recently closed USAF bases with land that the U.S. government still owns (i.e. Arizona, Nevada, Texas?). The true cost of training the GAF pilots can then be more accurately tracked since all training and operations on that base would pertain to training their pilots. The German government should pay for the use of our land, training by the USAF, and resources used. We could then maintain a larger number of our pilots on active duty, without increasing the USAF budget, and train the GAF in the U.S. (since they apparently do not want to use their own country to do this).

Sincerely,

Anthony Sforza, M.D.

Anthony Sforza, M.D.

11-4946

Intentional Misrepresentations and Omissions in the United States Air Force (USAF) document:

"PROPOSED AIRSPACE MODIFICATIONS TO SUPPORT UNITS AT HOLLOWMAN AFB, NM" (Ref.1); Final Environmental Assessment.

1. Socioeconomic Impact. The socioeconomic impact of the proposal is conspicuously missing from the document. However, in the Environmental Impact Statement (EIS) of Ref. 2, made for the expansion of operations at Holloman AFB, the socioeconomic impact is a large section of the report. The reason it is detailed there, is because of the overall positive impact on that area. Many areas including increased general income, reduction of unemployment, improvement in tax base, etc., are reviewed. In the presented Environmental Assessment (EA) (Ref. 1) there is no mention of the socioeconomic impact on the region under this airspace.

No mention is made of the blossoming movie industry for westerns in southwest Texas, which will be destroyed if this proposal goes through. Having these aircraft (approx. 20 per day) flying from 100-300 ft above ground level (AGL) will destroy the ability of movie-makers to take any shots on the horizon in our region, where we have great distant views. The relative flatness, great visibility (generally see 60-80 miles), low growing trees and shrubs that don't obscure the view for long distances, give great panoramic shots. It would be rather hard to convince the public that this film represents the old west in the 1800's if you have fighter aircraft flying across the horizon.

There is no question that having these warplanes flying across large pieces of privately owned land will diminish the value of these properties. Further, these air routes cross three state highways going to Big Bend National Park (and they intersect state highways and freeways in southwest Texas at least 13 times). It certainly will discourage new retirement housing in our area which has been blossoming in the past five years.

2. Misrepresentation of planned use. In Ref.1 all the data that is shown is for 12 German Air Force (GAF) aircraft. The report indicates that over air routes IR-102/141 approximately 8 flights per weekday will occur. All data that was submitted indicated this number of aircraft as a basis of calculation; however, in Ref. 3 - Finding Of No Significant Impact, it is mentioned that the USAF is considering bringing in an additional 30 Tornado aircraft to Holloman AFB. In Ref. 2 on page ES-2 the following statements are made: "To support full training needs, MOAs and MTRs in the area would be used for low-level flight operations. This action would capitalize upon using restructured airspace from an unconnected previous proposal. That proposal, which is presently under consideration (Proposed Airspace Modifications to Support Units at

Holloman AFB, New Mexico (US AF, 1996), involves airspace modifications in southern New Mexico and west Texas. And further, in the same paragraph has the following: "If implemented, the modified airspace would be used by the additional 30 Tornados." It is clear from Ref. 2 that the USAF already has made plans for the 1999 deployment of additional GAF aircraft. This was left out of EA (Ref. 1) report, so that the numbers that were presented for noise, accident rates, burned jet fuel in the air, etc., would all be much lower than presented. These reports were presented by the same individuals and agencies. The actual planned flights are more than double the numbers used in this report. Had the correct numbers been used, there would have been a significant change in the final EA report.

3. Visual Impact. There has been no mention in the EA report of the visual impact of having these 20 warplanes flying at extremely low altitudes across vast areas of southwest Texas. One of the main considerations of people like myself who have moved to this area, has been the beautiful distant views. The land reminds you of what this country was like 200 years ago. There are virtually no structures that you can see because they are easily covered by the small rolling hills we have, and there are no significant numbers of telephone poles to see. And very few highways or other signs of modern civilization for vast distances. Our typical visibility is 60-80 miles, and because of the arid climate, we have low trees and bushes as the primary vegetation so as to pose no visual obstruction. Having 20 war planes a day, screaming across the sky with noise levels up to 70 dB SEL at 3.75 miles, will certainly destroy our tremendous scenery and tranquility.

The town of Alpine proudly displays a banner, "Home of The Last Frontier". People come to this region to see this beautiful country and experience what it was like hundreds of years ago. However, having warplanes screaming across the ground at low altitudes on roads enroute to Alpine and to Big Bend National park, would certainly give one doubts as to whether this banner should be flown any longer.

4. Noise. The noise data presented is a gross misrepresentation of what will actually happen to this area if these flights are allowed to occur. As stated by Col. Kurt Cichowski (that the noise caused by these planes would be less than) "the noise level of a vacuum cleaner operating 10 ft away is about 70 dBs." He further stated that the elevated sound levels in the area with these military aircraft flying would be 28-59 dB's as is documented in Ref. 1. In Fig. A is a table from Ref. 2, that shows that the actual noise level that a person would hear from a Tornado aircraft would be at least 124 dB (which is at a lower speed and lower dB level than

what is actually planned; 480 knots vs. 515 knots) and with the F-4's is 130 dB. With the F-4's the noise level is still 60 dB at an altitude of 20,000 ft. It has been well documented in multiple reports that noise levels over 85 dB will cause hearing damage. At levels over 85 dB for greater than 8 hours is considered to cause hearing damage. At 88 dB this would occur in 4 hours (Ref. 4). The increase of 3 dB doubles the sound intensity. In Ref. 1 on pg. 4-9, the USAF also indicates that the maximum amount of time per day that a person can be exposed to 115 dB without hearing protection is 15 minutes. Sounds levels above 130 dBs can cause immediate damage. Further, no mention is made of the frequency of the noise which can cause damage from resonant frequencies (such as an opera singer breaking a glass).

Figure B contains the data presented by the USAF in Ref. 1, which is incorrect. Anyone who has listened to a train whistle as the train comes down the track, knows that as the train approaches there is a high frequency sound followed by a low frequency sound as the train passes. This is because of the train traveling toward you in the same direction of the sound until it passes you. The sound waves are compressed as the train approaches you. With these aircraft flying at near Mach 0.9 or approx 9/10 the speed of sound at 5,000 ft, the sound frequency and suddenness of presentation is quite different than that shown in these diagrams. In reality the sound comes on and peaks very abruptly, causing a startle. The sound presents in a few seconds, and then there is a loud roar for a prolonged period of time following the jet's passage. This is shown in figure B and is marked as "Reality". Another analogy for understanding the suddenness of the sound of these aircraft, is the flight of a bullet which is traveling at supersonic speeds. We know that you can be hit by the bullet before you ever hear the sound. These planes are flying at near the speed of sound at this altitude, and therefore give you very little warning and a severe startle as they come up on you. This can cause an accident if you are on a horse, walking, on a ladder, or driving a car down the highway. This can be disorienting, and can and will, cause accidents. One of the purposes of flying at these extremely fast speeds close to the ground is for air-to-ground attack. These planes are designed to surprise the enemy. I do not believe that we should surprise individuals who are using their private land, in the same manner. On the lower half of figure B, a value of 113 dB is shown, however, as is indicated by the USAF in Ref. 2, a value of 124dB for the Tornado Aircraft and 130dB for the F-4 are the correct numbers. To help understand these sound levels, sound levels of common sounds from Ref. 2 is presented in Fig D. It can be seen in this figure that compared to the loudness of a vacuum cleaner at 10 ft, the loudness at 120 dB would be 32 times as loud and would be uncomfortable.

The actual aircraft that will be flown on IR-102/141 are shown in Fig C from Ref. 1. This Figure is amended to show that in 1999 this will increase to 1,549 sorties which converts to approx. 19 flights per week day (a sortie is from 2 to 4 or more aircraft flying at a time, separated by approximately two miles horizontal distance). Had these planned numbers been used, the numbers of the noise values would have been higher. Even though this was well known to the planners, this was not included in this document.

5. Over-pressure. The USAF has intentionally left out any mention of aircraft over-pressure when flying at these low altitudes. It is well known that there is wing down-wash and wing tip vortices generated by flying aircraft. The larger and faster the aircraft, the more energy is contained in these generated air currents. The tornado aircraft at 61,700 lbs max weight, at 515 mph, at 100 ft above the ground, will cause a significant over-pressure and twisting winds directly under its flight path. These forces would be great enough to significantly damage agricultural windmills and small structures on private property, as well as add to the startle effect and potential for knocking someone off a horse, to the ground, or off a ladder. No data at all was presented regarding this matter, although the USAF should have multitudes of data on the subject. If the data is not available, it should be obtained and presented.

6. Accidents. No mention has been made in the report as to the potential for injuries as a result of these low flying aircraft flying over private lands. The assumption is made that the pilot will steer clear of any person, vehicle or structure by at least 500 ft as is required by FAR 91.119. However, flying at 100 ft above the ground at 515 mph over rolling and hilly terrain (as is part of its tactical design for surprise), it would be virtually impossible for the pilot to see a rancher riding on a horse, working on a windmill, or shooting a rifle, etc., and still be able to pull up and avoid this situation by more than 500 ft. The proposed route intersects state and federal highways at least 13 times along its route in Texas. It intersects many more county and ranch roads in Texas. This presents a great hazard to motorists on many of these winding state, county, and ranch roads. The startle effect of these rapidly approaching aircraft could definitely cause an accident. There has been no data presented simulating these conditions.

7. Aircraft Avoidance. We do have people visiting the area in light aircraft relatively frequently. They fly to Terlingua, to Alpine and to the small privately owned air strips in the area. Although this is a relatively small number of aircraft, the potential over time is significant for an air disaster. When

aircraft come up suddenly from behind hills, it is impossible for them to see aircraft on the other sides of these hills. Flying at 515 mph after cresting a hill and dropping into a region that may be 1000 ft below the crest of the hill, it would be relatively easy to run into a private aircraft unintentionally. Even if the aircraft was not hit, the severe wake turbulence left by this jet could cause severe damage and loss of control of the light aircraft.

8. Potential Accident Rate. In Ref. 1, the accident rate quoted for these operations has been one accident in 76 years. The data shown in Fig. E from Ref 1 shows the figures presented by the USAF. The way these figures have been used both in this document and in public hearings is that the likelihood having an accident is once every 76 years. If you look down the chart you will see that the A-10 aircraft, which will also be flying this route, would only have an accident every 4,203 years. The fact that two have crashed in the last 3 months, and has been in the national news, makes one question how this data is presented.

Using the data presented, in 1999 there is a projected 1549 sorties with an average of three aircraft, with an average of one hour flight time each yields: 4,647 hours (not 534). At a 2.45 Class A mishap rate per 100,000 hours results in one Class A mishap every 8.78 years (not every 76 years). In addition when the USAF made these estimates and the made original presentation in Ref. 1, they were talking about highly trained and experienced GAF pilots. As is revealed in Ref 2., in 1999 the USAF will start training GAF pilots starting with inexperienced pilots for basic training, up to and including these high speed, low level flights. The likelihood for training accidents in new pilots increases significantly and has not been accounted for.

9. Federal Aviation Regulations. Currently there are two federal aviation regulations that are being asked to be waived. The first being FAR 91.117 - Aircraft Speed, and the second FAR 91.119 - Minimum safe altitudes.

FAR 91.117 basically states that aircraft cannot fly in excess of 250 knots below 10,000 ft (MSL). The USAF obviously wants to exceed this by going 515 mph down to 100 ft AGL. This is an unsafe condition is indicated above, and that is why this rule exists and should be maintained.

FAR 91.119 indicates that the minimum safe altitude should be 500 ft above surface and no closer than 500 ft to any person, vessel, vehicle, or structure. This is an old rule that was established before having aircraft with these high speed and weight abilities.

There was no consideration at that time for having war planes that could fly at near sonic or supersonic speeds in the 500 ft safe minimums. Basically the 500 ft clearance should be raised because it is already an insufficient clearance for modern, more powerful, and larger aircraft. However, this rule functioned well if FAR 919.117 was observed, since aircraft would be limited to a maximum air speed of 250 knots below 10,000 MSL. These aircraft should not be allowed to fly at speeds greater than 250 knots below 10,000 MSL and should not be allowed to fly within 500 ft of a person, vehicle or structure, etc., over private land regardless of how sparsely populated it is.

10. Proposed Test. I propose a test be conducted to determine the impact on individuals who occasionally come under the flight path of these aircraft flying at approximately 100 ft above ground level at 515 mph. The test would be conducted on one of these ranches under the proposed air space over its naturally rocky terrain. At least 10 of the top officials from the USAF and the US Army Corps of Engineers that have prepared this document would be instructed on riding the local ranch horses. Then these individuals riding horses would stay in a 1-acre barbed wire fenced area. Approximately ten cattle and one bull would then be added to simulate ranching conditions. Then 10 sorties (over a period of time in one day) of 2 Tornado aircraft flying in close formation would fly over this one acre area at 100 ft AGL at 515 mph. Baseline audiology and speech threshold testing would be done by a mutually approved agency and observed by the USAF and civilian representatives of the community, and the repeat of these baseline tests would be performed the day after the simulation was done. In this way we could test several theories: 1. whether there was any hearing damage caused by these flights; 2. whether this sudden startle would cause the typical ranch horse to rear-up and run or throw the rider; 3. document the number of injuries resulting from any accidents.

Of course the USAF should have emergency medical personnel on hand, and the participants should wear protective head gear. But think what could happen if they were required to act out the following scenario as a real rancher would experience:

These riders would not be allowed to wear any protective gear such as helmets or elbow pads since this is not normal attire for our ranchers. Of course no emergency vehicles would be present to provide emergency aid since there is normally none available. Each individual that fell would have to crawl back to the closest ranch and call for emergency services. Then they would try to explain how to find them on this ranch with no road signs and no street

addresses, so that they could be transported to nearest hospital which is approx 30 miles away. It would require at least 1-1/2 hours from the time the call is made to time they could be picked up and brought to the hospital. At that time, if the person had a head injury, they would need to be transported three hours by ambulance to the Odessa-Midland area. This is the nearest neurosurgery that is available in our region. The USAF would not be able to respond, since under normal circumstances unless a plane crashed, they wouldn't even know there was an accident.

References:

1. Proposed Airspace Modifications to Support Units at Holloman AFB, NM; Final Environmental Assessment; USAF Air Combat Command; June 9, 1997
2. Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico; Environmental Impact Statement; USAF, June 1997
3. FINDING OF NO SIGNIFICANT IMPACT; Chairperson, ACC Environmental Leadership Board; Susanne M. Waylett, Colonel, USAF; June 12, 1997.
4. Noise and Hearing Loss. NIH Consensus Statement Online 1990 Jan 22-24 [cited year month day];8(1):1-24.

July 7, 1997
Anthony Sforza, M.D.

Table 4.2-1. Aircraft Maximum (L_{max}) A-Weighted Sound Levels at Various Altitudes

Aircraft Type	Altitude, Ft AGL									
	100	200	500	1,000	2,000	5,000	10,000	20,000		
F-4	130	124	115	107	99	87	75	60		
F-16	119	113	104	97	89	76	64	48		
F-117	127	121	111	103	94	79	65	46		
T-38	103	97	88	81	73	61	49	36		
Tomado-MTR,										
Air-to-ground	124	117	108	101	93	79	66	50		
Tomado										
Air-to-Air	117	111	102	94	86	72	60	46		
Other*	129	123	114	107	98	86	73	57		

* Representative data for other aircraft types using affected airspace (see Chapter 2.0)

** THESE VALUES ARE FOR 480 KNOTS
 IT IS STATED THESE AIRCRAFT WILL BE
 FLYING AT 515 TO 540 MPH I.E. MACH 0.9
 AT 5,000 FT

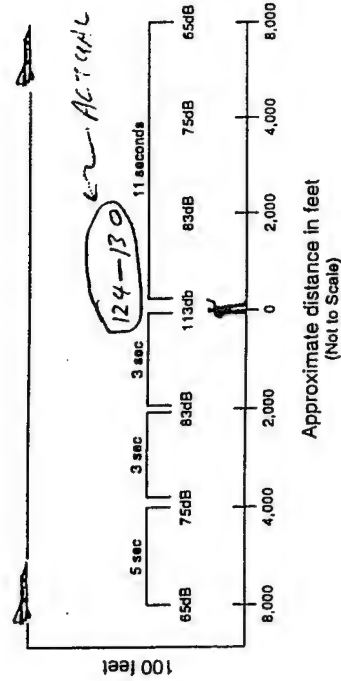
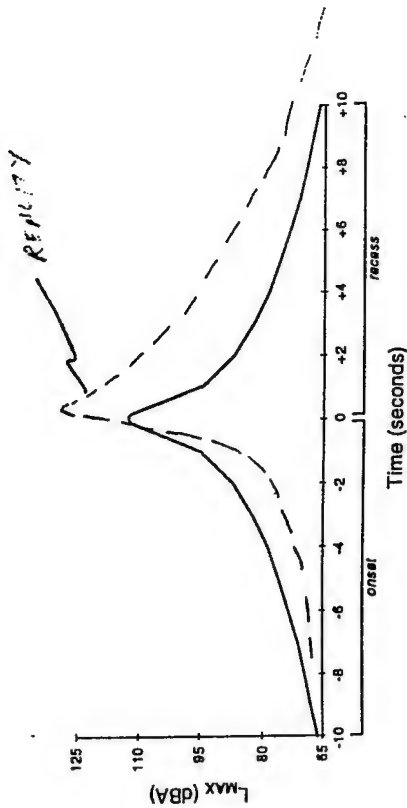


Figure 4.1-2 Noise Exposure from a Single Overflight of a PA-200 at 100 Feet AGL.

FIG B

R2; 4-7

R2; 4-7

FIG A

approximately 80 percent of the time, and require about 0.8 hours of flight time. No ground disturbing activities would occur as a result of the proposed modification or use of the MTRs.

Although the ALCM routes to be consolidated have not historically been used for low-level aircraft flight, the majority of the area overlain by the proposed routes are currently under other existing MTRs. Only about 12 percent of the route corridor is not currently overflown by military aircraft.

IR-102/141 would be used for low-level flight training by a variety of potential users. It is anticipated that potential users would include, various DoD aircraft and DoD-sponsored aircraft. Table 2.1-1 lists the aircraft that would use the routes and the approximate number of day and night sorties each aircraft type would fly on each track in the course of a year. Day sorties are those that would be flown between the hours of 7:00 a.m. and 10:00 p.m., and night sorties would be flown between 10:00 p.m. and 7:00 a.m. Under the proposed action, most night sorties are expected to be flown before 11:30 p.m.

Table 2.1-1 Anticipated Annual Day/Night Sorties on Modified IR-102/141.

Aircraft	IR-102 Short Track	IR-102 Long Track	IR-102 Short Track	IR-141 Long Track
PA-200	96/10	24/3	224/25	56/7
F-4	5/0	0/0	20/0	0/0
A-4	2/0	1/0	5/1	1/0
A-6	2/0	1/0	5/1	1/0
A-10	2/0	1/0	6/0	1/0
B-1	7/0	2/0	17/0	4/0
B-52	4/0	1/0	11/0	3/0
F-14	2/0	1/0	5/1	1/0
F-15	2/0	1/0	6/0	1/0
F-16	10/0	2/0	22/0	6/0
F-18	2/0	1/0	5/1	1/0
F-111	2/0	1/0	5/1	1/0
HC-130	2/0	1/0	5/1	1/0
T-38	2/0	1/0	5/1	1/0
Total Annual Sorties	140/10	38/3	341/32	78/7
Average Day Sorties	0.6	0.2	1.5	0.3

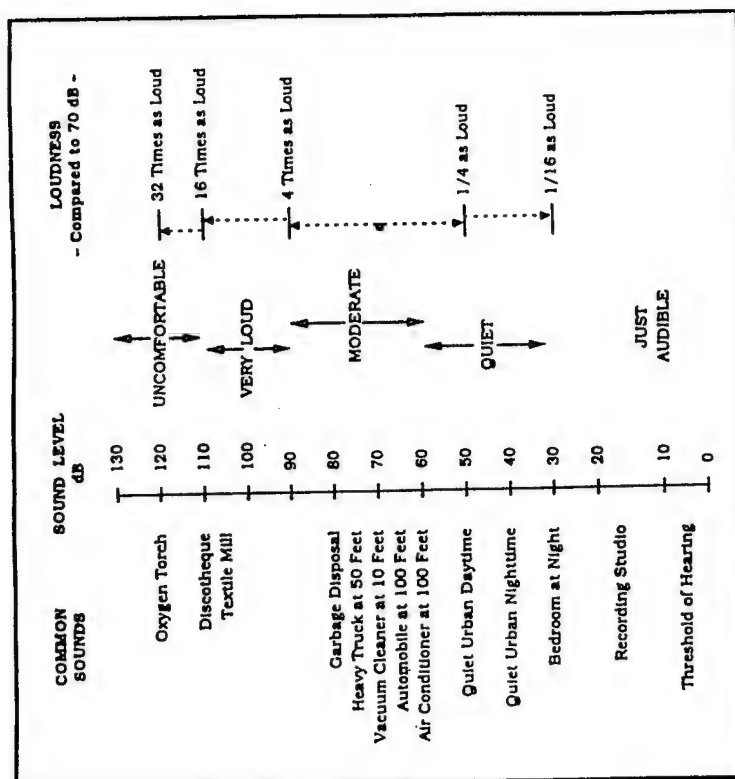
Note: First number indicates day sorties flown between 7:00 a.m. and 10:00 p.m.
Second number indicates night sorties flown between 10:00 p.m. and 7:00 a.m.

= 649 SORTIES
IN 1993 W/1
INCREASE T.
1549 SORTIES

FIG. C

RJ 2-5

FIG. C SORTIES
~ 19 FLYS PER WEEK



Source: Handbook of Noise Control, C.M. Harris, Editor, McGraw-Hill Book Co., 1979.

Figure C-1. Typical A-Weighted Sound Levels of Common Sounds

FIG. D

RJ 2-5

contamination plume. The locations and characteristics of surface and groundwater in the area will also affect the extent of contamination to those resources.

Table 4.1.4-1 Class A Mishap Projections.

Airspace	Aircraft	Class A Mishap Rate	Sorties per Year (Proposed)	Flight Hours per Year (Proposed)	Projected Years Between Mishaps (Proposed)
IR-102/ IR-141	PA-200	2.45	445	534	76
	F-111	6.22	10	12	1,339
	F-16	4.91	40	48	424
	A-10	2.60	10	16	2,403
	F-15	2.64	10	12	3,156
	F-4	5.79	25	30	575
	B-1	4.77	30	32	655
	B-52	1.29	19	30	2,584
	C-130	1.01	10	22	4,500
	F-18	2.07	10	12	4,025
	F-14	5.76	10	12	1,446
	A-6	3.33	10	12	2,502
	A-4	N/A	10	12	N/A
	T-38	1.60	10	12	5,208
Talon MOAs	PA-200	2.45	300	200	204
	F-4	5.79	970	647	26
	T-38	1.60	859	430	145

Source: Mishap Rates: USAF and USN Flying Safety Center. GAF Liaison

Note: Sortie Levels: Air Combat Command.

Note: N/A = Not Available or Not Applicable

Disaster response capabilities already in place are fully capable of managing any emergency situation that may occur. USAF units maintain detailed mishap response plans. These plans assign agency responsibilities and prescribe functional activities necessary to react to major mishaps, whether on or off base. Response normally occurs in two phases.

The initial response considers such factors as rescue, evacuation, fire suppression, safety, and elimination of explosive devices, ensuring security of the area, and other actions immediately necessary to prevent loss of life or further property damage. Subsequently, the investigation phase is accomplished.

The initial response element includes the Fire Chief, who will normally be the on-scene commander. That element will include fire fighting and crash rescue personnel, medical personnel, security police, and crash recovery personnel. A subsequent response team

21, 4-16

FIG. E

CONSTRUCTIVE NOTICE

1. Floyd William, Hornback, (hereinafter Plaintiff) being first duly sworn according to law, having first hand knowledge of the facts herein, and being competent to testify, do affirm that the facts herein are stated by the Plaintiff, and are true, correct, and complete, stated under penalties of perjury pursuant to the laws of the United States of America.

Know all men by these presents, Floyd William, Hornback, brings this Notice for the people of these united States of America, under the American flag of peace, without an attorney, ex rel. now defines and states:

Ex rel.: for the people of the united states defined: "...But it is the manner of enforcement which gives Title 42 U.S.C. 1983 its unique importance, for the enforcement is placed in the hands of the people." Each citizen, "acts as a private attorney general who takes on the mantle of the sovereign, guarding for all of us the individual liberties enunciated in the Constitution." Section 1983 represents a balancing feature in our governmental structure whereby individual citizens are encouraged to police those who are charged with policing us all. Thus, it is of special importance that suits brought under this statute be resolved by a determination of truth." Wood v. Breiter, 54 F.R.D. 7, (1972)

- 1) You have sworn an oath of office to support and defend the Constitution and the laws of this State and these united States, and having taken such oath before a competent tribunal, officer, or person authorized to administer such oaths, any breach thereof may constitute a liability to you in both your individual and official capacity of which you may by a breach, waive any immunities to suit therefrom.
- 2) A breach may constitute a false swearing to your oath and is a violation of the Constitution of these united States and of Article XX, Section 1 of the Constitution of the State of New Mexico and constitutes perjury. This perjury is a violation of Title 18 USC section 1621, and may possibly be considered a conspiracy under Title 18 USC sections 242, for the deprivations of those rights as secured to this Citizen under the Constitution of these united States of America.
- 3) Title 42 USCA sec 1986 "Action for neglect to prevent". Every person who having knowledge that any of the wrongs conspired to be done, and mentioned in Title 42 USCA sec 1983 of this title, are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured, or persons legal representatives, for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented; and such damages may be recovered in an action on case; and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in action. (42 USCA sec 1986 is derivative of sec 1985 and provides remedy for persons injured by neglect or refusal of those having power to do so to prevent wrongs specified in sec 1985).

- 4) Title 42 USCA sec 1985 "Conspiracy to interfere with civil rights" (1) ... (2) ... or if two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws; (3) Depriving persons of rights or privileges. If two or more persons in any State or Territory conspire, or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person (or class of persons) of the equal protection of the laws, or of equal privileges and immunities under the laws, or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; ... whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages, occasioned by such injury or deprivation, against any one or more of the conspirators.

5) Title 42 USCA sec 1983 "Deprivation of Rights". Every person who, under color of any statute, ordinance, regulation, custom or usage, of any State or Territory of the District of Columbia, subjects, or causes to be subjected, any citizen of the United States, or other person within the jurisdiction thereof to the deprivation of any rights, privileges or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceedings for redress.

6) You are hereby notified pursuant to Title 42 USCA section 1986, for knowledge of the law, as to your high standards of the law, and as witness, that any "Neglect" to prevent constitutional wrongs from injuring this Citizen, that if such neglect proximately causes damage it will give rise to an action in "tort", further, be advised by acting in concert with others, this may be construed as conspiracy under Title 42 USCA sec. 1985.

7) FRAUD; An intentional perversion of Truth, for the purpose of inducing another in reliance upon it to part with some valuable thing belonging to him or to surrender a legal right; a false representation of a matter of fact, whether by words or by conduct, by false or misleading allegations or by concealment of that which should have been disclosed, which deceives and is intended to deceive another so that he shall act upon it to his legal injury. A generic term, embracing all multifarious means which human ingenuity can devise, and which are resorted to by one individual to get advantage over another by false suggestions or by suppression of truth, and includes all surprise, trick, cunning, dissembling, and any unfair way by which another is cheated. "Bad Faith" and "Fraud" are synonymous ...

8) Title 18 USCA sec 872; Extortion by officers or employees of the United States. Whoever, being an officer, or employee of the United States or any department or agency thereof, or representing himself to be or assuming to act as such, under color or pretense of office or employment commits or attempts an act of extortion, shall be fined under this title or imprisoned not more than 3 years, or both; ...

9) Air Rights : The right to use all or a portion of the air space above real estate. Such right is vested by grant, e.g. fee simple, lease, or other conveyance. While commercial airlines have a right to fly over ones land, if such "flight paths" interfere with the owners use of such land, the owner is entitled to recover the extent of actual damages suffered by him. United States v. Cauby, 328 U.S. 256, 66 S. Ct 1062, 90 L.Ed. 1206. B.L.D. 6th Ed

10) Posting. In connection with trespass statutes. The act of placing or affixing signs on private property in a manner to give notice of the trespass. BLD 6th Ed

11) Trespass. An unlawful interference with one's person, property, or rights... Any unauthorized intrusion or invasion of private premises or land of another.... Criminal trespass is entering or remaining upon or in any land, ... by one who knows he is not authorized or privileged to do so; ... Intrusions upon, beneath, and above surface of land. (1) Except as stated in subsection (2), a trespass may be committed on, beneath, or above the surface of the earth. (2) Flight by aircraft in the air space above the land of another is trespass if, but only if, (a) it enters into the immediate reaches of the air space next to the land, and (b) it interferes substantially with the other's use and enjoyment of his land.... Trespass with force and arms. The common-law action for damages for any injury committed by the defendant with direct and immediate force or violence against the plaintiff or his property.... Liability for intentional intrusions of land. One is subject to liability to another for trespass, irrespective of whether he thereby causes harm to any legally protected interest of the other, if he intentionally (a) enters land in the possession of the other, or causes a thing or a third person to do so, or (b) ... (c) ... BLD 6th Ed

Any person or persons having knowledge of these facts and who has fiduciary duty to act in a reasonable manner to either prevent or correct the wrongs taking place or having the power to prevent or aid to prevent the commission of the same, shall be liable to this Plaintiff or his legal representatives for any and all damages caused or incurred by such wrongful acts, actions, inaction, or omission, which such

person could have by reasonable diligence prevented, may be joined pursuant to Title 42 USCA sections 1986, 1985, and 1983 in any action taken as a result of these wrongs.

Any Complaint for damages will be filed under the American Flag of Peace of the United States of America. No jurisdiction under any American flag of war will be accepted.

Hereinafter: U.S.C.A. = United States Code Annotated
N.M.S.C. = New Mexico State Constitution
B.L.D. 6th Ed = Black's Law Dictionary
Disguise = Without Oath by perjury without protection
Citizen = Man, not as an Official

Respectfully Submitted for Notification,

Floyd William Hornbuck
Floyd William Hornbuck
c/o P.O. Box 1586
Alamogordo, New Mexico
PZ 88310

Before me, a Notary Public, appeared Floyd William Hornbuck, and did affirm and subscribe hereto on this 11 day of July, 1997.

My commission expires,

08-19-00



Noury Kinberg
Noury Kinberg

CERTIFICATE OF SERVICE
A true and correct copy of this CONSTRUCTIVE NOTICE was served personally or by Certified U.S. Mail to the following :

Lt. Col. D. Hargarten
Holloman AFB, NM

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

Notice to the Agent is Notice to the Principle.



COUNTY OF OTERO
1000 NEW YORK AVENUE, ROOM 101
ALAMOGORDO, NEW MEXICO 88310-6635

July 11, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

RE: Proposed Expansion of the German Air Force Operations at Holloman AFB, NM
(Final Environmental Impact Statement)

Dear Ms. Parker:

All three commissioners will be out of town on business, and I have delegated Mike Nivison to state Otero County's position. I thank you for allowing us time to speak and I apologize for any inconvenience.

As stated before the Otero County Commissioners would like to comment on pages ES-2. We strongly support the Tularosa Basin portion of McGregor Range, as we feel from our cumulative information that this is acceptable to the county. We, the Otero County Board of Commissioners, cannot support the other two options.

I would also like to submit a list of concerns regarding the NEPA process. If you have any questions, Mike Nivison will be glad to answer your questions in full. A letter will be forthcoming.

Sincerely,

Ronny Rardin
Otero County Commission Chairman

COPIES SENT TO SENATOR PHIL GRAMM AND SENATOR KAY BAILEY HUTCHISON

Proposed Expansion of the German Air Force Operations at Holloman AFB, NM
Page 2 of 2

The proposed expansion of German Air Force operations at Holloman AFB, NM falls under the authority of National Environmental Policy Act (NEPA) Public Law 91-190, 1969

Sec. 1501.5

Where appropriate the lead agency should seek the cooperation of state or local agencies of similar qualifications. (Otero County is significantly effected, and has requested involvement with no response)

Sec. 1501.2

Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process to head off potential conflicts.

1. Otero County is not on the list of Personal Communication.
2. Otero County is not on the mailing list. (Had to request a copy of draft EIS)
3. No substance of the Custom and Culture Documents from Otero County, that we delivered to the Air Force, were considered.
4. No Otero County Public Land Use Plan or Ordinance were considered, or requested.
5. PLUAC was given a verbal report in September of 1996. It was reported that information was too preliminary, and we would receive a comprehensive update in November 1996. Nothing has been forthcoming.
6. In a separate meeting with Senator Dominici, Senator Bingaman, and Congressman Skeen, the Air Force was asked to work with Otero County. Otero County has waited in good faith, and has not been contacted by phone, in person, or by correspondence, and yet you publish a Draft EIS.

FOR YOUR INFORMATION

Imogene & Howard Chamberlain
P.O. Box 1583
Alpine, TX 79831

July 15, 1997

Senator Kay Bailey Hutchison
703 Hart Office Building
Washington, DC 20510

Dear Senator Hutchison

We recently attended a very disturbing meeting on a proposed military training plan. The meeting was to consider an Environmental Impact Statement for low altitude training in the New Mexico and West Texas. In summary the Air Force was proposing to base an additional 30 German Tornado aircraft, in addition to the existing 12, at Holloman Air Force Base near Alamogordo, NM and fly missions over our area. The proposal includes lowering the floor of the training routes to 100 feet above the ground level. It was stated at the meeting that the Tornados would be flying at 450 knots (about 510 miles/hour) at these very low altitude. We feel that the Environmental Impact Analysis is flawed in their analysis of the impact of this type of flight activity on those near the flight path; they only report change in a 24 hour average sound level. We also have serious concerns about the flight safety of general aviation aircraft given the proposed flight operations.

We believe that this type of flight training is necessary for military survival; however it is totally inappropriate to fly at over 500 miles/hour at 100 feet over range land that is in active use. The question should not be should the Germans be allowed to do it but should anyone be allowed to do it. Our conclusion is that it is totally unsafe for those forced to exist on the ground below it. Such training is necessary but not over occupied land; it should be done over sterile corridors.

We ask your help defeating this dangerous proposal

Our reasoning and thinking are as follows:

Consequences of such low level flights -- it was stated in the meeting that the noise level of the proposed aircraft in overflight at 500 feet was about 105 decibels. So, at 100 feet the sound intensity would approach and possibly exceed 130 decibels, the threshold of pain. Consider the reaction of wild and domestic animals to such a sudden increase in the noise level from such an overflight. They will panic and run, run through anything in their way. The environmental impact statement states there will be very little sound impact due to the proposed overflights. Their conclusion is based on average increase in sound over 24 hours. On that basis it is minimal; however, that is not the right measure. The response of the inhabitants of the overflight area must be considered. The sound level will go from the relative quiet of a pasture to a shriek almost instantly for the aircraft will be flying at high subsonic speeds. It will be devastating to anything below it!

History -- the military have a much less than perfect record in controlling their pilots when flying on these training missions. There is much evidence of excessively low flying or buzzing of the facilities and folks on the ground in the past. When flight was restricted to 300 feet above the ground people have been thrown by horses scared by the aircraft, windmills have been destroyed, herds stampeded, etc. I do not believe this is the consequence of flight at 300 feet above the ground but deliberate very low level flight. Unauthorized, yes; but accomplished anyway. We have no reason to believe that the Air Force will have any better results of trying to control these newer pilots than they have in the past. Deliberate or accidental very, very low level flight will occur.

Damage claims -- damage claims have had to been supported to the point that no other possible cause could have caused the damage. This is beyond the ability of most ranches. In many cases the damage isn't discovered until considerable time has passed. The consequence is that the rancher is unable to collect damages in any reasonable way and pay them himself.

Airspace impact -- The proposed flight route almost completely surrounds our town of Alpine. Most light aircraft can not climb rapidly enough to fly above these proposed training routes and with the bases at 100 feet they can not safely fly below them. Pilots of light aircraft will be forced to fly through these training routes either when leaving or returning to Alpine. This is not a safe way to go. Air Route Traffic Control radar is not effective in this area at the normal flight altitudes for light aircraft. Radar can not help solve the potential conflict problem without significant new installations. Remember these aircraft normal very low altitude flight airspeeds are over 500 miles per hour. The aircraft is moving at close to 8.4 miles/minute. Presuming a pilot can see the other aircraft at 2 miles he has less than 1.5 seconds to react to get out of the way. This is not a safe environment.

Restrictions of civil flight -- it is important to contrast normal civil flight operating rules with the proposed military training routes rules. No flight is allowed closer than 500 to 1000 feet of the ground or closer than 500 feet of a person, vehicle or structure. No flight at speeds above 250 knots (approximately 288 miles an hour) below 10,000 feet is allowed. (See Federal Air Regulations 91.117 and 91.119 for full details.) Both of these rules would be badly violated by the proposed flight operations.

Senator, we strongly plead that you will not allow this to happen.

Sincerely,



Imogene K. Chamberlain

Howard Chamberlain

p.s. We are enclosing clippings from our local newspaper, The Alpine Avalanche, to help support our views.



COUNTY OF OTERO
1000 NEW YORK AVENUE, ROOM 101
ALAMOGORDO, NEW MEXICO 88310-8835

July 29, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley Air Force Base, Virginia 23665-2769

Re: Request for a 90-day extension to comment on the Draft
Environmental Impact Statement pertaining to the Pro-
posed German Air Force Operations in Otero County

Dear Ms. Parker:

The Otero County Commission did not receive a copy of the Draft Environmental Impact Statement relative to the proposed German Air Force Base operations in Otero County in a timely manner due to the fact that we were not on your mailing list. Therefore, since we were not afforded an opportunity to participate and submit our comments on an issue that is of great importance to the citizens of Otero County, we are requesting a 90-day extension to submit our comments. Also, we are requesting that you place us on your mailing list in order that we receive information in a timely manner when it comes to issues concerning Otero County.

We did not receive our draft until a couple of weeks ago, and it did not specify a date for the comment period. The document is quite lengthy and we need time to carefully digest its contents in order to make good decisions. Since this issue pertains to Otero County, we feel our concerns and comments should be considered when it comes to issues that will have a significant effect on our county.

Your consideration of this request is appreciated.

Sincerely,
Ronny Rardin

Ronny Rardin
Chairman, Otero County Commission

RH/vf



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

August 4, 1997

Sheryl K. Parker
HQ ACC/CEVA
Air Combat Command
EIS Project Officer
129 Andrews Street
Suite 102
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

Enclosed for your consideration are some additional citizen correspondence letters, and selected news clippings we received from Harold Kelley from Alpine, Texas, transmitting comments as a result of their review of a Finding of No Significant Impact on the Environment and a current Draft Environmental Impact Statement (EIS) evaluating potential impacts of the German Air Force (GAF) Replacement Training Unit and associated air space modifications for Holloman Air Force Base, New Mexico.

Mr. Kelley has expressed his opposition to the GAF Replacement Training Unit. We are forwarding his concerns and again ask that his comments receive full consideration in the decision making process. The 45-day comment period for the Draft EIS ends August 4, 1997. We ask that the transmitted comments prepared by Mr. Kelley be responded to and addressed in the Final EIS.

We appreciate your assistance on this matter. Please keep us informed of any actions to be taken by the Air Force in response to Mr. Kelley's concerns. If you have any questions, please call me at 214-665-7451.

Sincerely yours,

Michael P. Jansky
Michael P. Jansky, P.E.
Regional Environmental Review
Coordinator

Enclosures

RECEIVED
US EPA, DALLAS, TX
ASSOCIATE DIRECTOR

97 AUG -4 AM 8:13
COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

July 15, 1997

Environmental Protection Agency
Region Six
1445 Ross Street
Dallas, Texas 75202

Reference: Proposed Airspace Modifications To Support Units At
Holloman Air Force Base, New Mexico, June 9, 1997

Proposed Expansion Of German Air Force Operations
At Holloman AFB, New Mexico, Draft, June, 1997

Attention: Mr. Robert Lawrence

Dear Sir,

Please accept this as my complaint against the Proposed Airspace
Modifications To Support Units At Holloman Air Force Base (AFB) near Alamogordo, New Mexico.

Please accept this as my complaint against the Proposed Expansion of
German Air Force Operations At Holloman Air Force Base near Alamogordo,
New Mexico.

Find attached a summary of our analyses of this Environmental
Assessment (EA) done by the United States Army Corps of Engineers
(USACE), for the United States Air Force (USAF), for the referenced project
dated June 9, 1997. This EA has been through the "Draft Stage" and the
"Final Stage" with public hearings being held in the Trans-Pecos Area of
West Texas in July of 1996 and in June of 1997.

The analysis for the EA on Modifications of Airspace will also apply to the
Environmental Impact Statement (EIS) for thirty additional German Air
Force (GAF) aircraft proposed to train over the same routes.

It was after the July, 1996 public hearings that our analysis of this EA
was initiated. Our investigation into the unreasonable claims presented in
this EA has led into an analysis of the EIS, and on into other unreasonable
proposals and acts by the USAF. Our first protests were at the public
hearings. Our continuing protests go to our elected representatives at the
federal and state levels. With the compounding of discovery and the
proposed use of these routes, we feel it time to initiate a complaint with the
Environmental Protection Agency (EPA).

We are concerned about several claims and omissions made by the USACE
that do not seem reasonable. Our group includes an aeronautical engineer, a
medical doctor, a retired administrator from the Office of Safety and Health

Administration (OSHA), and myself, a construction contractor with a
background in Business Economics, Government Contract Law, Cost
Accounting, Business Administration, etc., for forty-two years and several
dozen successful construction projects for the USACE, USAF, Air Training
Command (ATC) and General Services Administration (GSA). We all have
extensive formal education and experience in our respective fields. We
consider ourselves to be reasonably competent in making an analysis of the
EA and the EIS.


This EIS for Proposed Expansion Of German Air Force Operations At
Holloman AFB, New Mexico, is the next step in compounding what we think
is a gross error in using six or seven Instrument Routes (IR) and Visual
Routes (VR) in this area for additional low-level training flights.

Please advise if there are any administrative steps we have not followed
in order to implement a viable complaint concerning the lack of a complete
and reasonable study of these proposed acts by the USAF in the Trans-Pecos
Area. I have been designated spokesman for this group until further notice.

We would like to thank Mr. Joe Swick for his assistance, and for any
assistance his associates may have contributed.

Respectfully,

Telephone (915) 364-2323


Harold Bryan Kelliey, CPCM(Ref)
Post Office Box 605
Alpine, Texas 79831

Attachments:

EA and EIS analysis
Separate Letter of Inquiry
News articles

RECEIVED
US EPA, DALLAS, TX
ASST. DIR. OF ENVIRONMENT

97 AUG -6 AM 8:13

COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

July 28, 1997

Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

Certified Mail

No. P 074 821 236

Reference: Proposed Expansion Of German Air Force Operations At Holloman
Air Force Base, New Mexico
Draft, Environmental Impact Statement, June, 1997

Subject : Complaint that USAF Public Hearings and the resultant actions
are UNFAIR.

We consider the presentation of this Environmental Impact Statement (EIS) as UNFAIR due to the lack of documentation, communication or verbal instruction as to the procedures required, and to the misleading content of the title used for this proposal. For all practical purposes, there was no public notice issued to the citizens of the Trans-Pecos Area (Trans-Pecos Area is the area of Texas north of the Rio Grande River, west of the Pecos River and south of the Texas/New Mexico border). Ordinary citizens not intimately acquainted with such proceedings do not know who to, or where to turn for counsel. The very wording of the title is misleading. Reading this "Proposed Expansion Of German Air Force Operations At Holloman Air Force Base, New Mexico" in a newspaper would not be of interest to a resident of Alpine, Texas, some 250 miles to the east. This title states this event is going to take place in New Mexico. What's the German Air Force doing in New Mexico? The additional reference to "German Air Force Operations" would remove it further from the Trans-Pecos Area.

And, when we read the newspaper about a year ago, and saw "Proposed Airspace Modifications To Support Units At Holloman Air Force Base, New Mexico", this, too, would not be of much interest to a resident in Marathon, Texas, 280 miles to the east. How can you modify, or change, an air space? Units of what? Only those who were not confused by the USAF's carefully constructed titles of such important announcements would attend the Public Hearings, and they did. The majority of citizens in the Trans-Pecos Area of Texas did not attend due to lack of awareness. As of this date, there is finally a feeling that the USAF cannot be trusted.

The results for the 1997 EIS Draft "Public Hearings" have been as it was for the Environmental Assessments of 1993 and 1996/1997. No one will represent the citizens of the Trans-Pecos Area of Texas.

Sixty-four (64) people attended the public hearing on July 7, 1997. Of the ones who wrote or called the USAF for information, to our knowledge, none of them have received any information as of July 28, 1997. The only response to telephone calls to the USAF was, "We'll look into it". No return calls have been received that we know of. At the July 7, 1997, Public Hearing on this EIS, a "court reporter" recorded everyone's words. A large percentage of people filled out a USAF form to receive a transcript of this recording. As of July 29, 1997, no one has yet received it. The closing date for public comment is August 9, 1997. The delay in receiving any information is one of the reasons we are presenting this complaint that these "Public Hearings" are UNFAIR.

The USAF personnel conformed to the requirements of the governing statutes. They did not advise how to contest these proposals, nor could they answer all our questions. There is no doubt that should there be another "Gulf Oil War", or other military confrontation, the desired training of the USAF personnel in the area of low-level combat flying is essential. However, the public has certain rights and privileges that must be paramount. The United States of America is not at war. There is no National Emergency. Where may the public turn to for information and assistance in making a reasonable decision regarding a proposal by the Federal Government?

Relative to the June, 1997 referenced EIS, investigation shows there is no assessment made concerning the Socioeconomic Impact of this USAF proposal relative to the Trans-Pecos Area. There was no evidence of compliance with Executive Order 12898, Environmental Justice, issued by the President of the United States on February 11, 1994.

The USAF assumes that entering certain information into the Table of Contents, then entering the same information in whole, in part, or in error, constitutes a valid study or assessment; not so. It would be the same as saying, "The building is on fire. There is a fire station around the corner." But, everyone just stands there. Nothing is done about the fire. Very incompetent administration, or perhaps an attempt to conceal the true and correct conditions.

Our investigation shows there to be a series of errors, omissions and incorrect assumptions in the USAF's calculations of the Environmental Impact Concerning Pollution and Noise. There are technical errors such as incorrect training air speeds, the confusion of Knots Per Hour with Miles Per Hour and complete ignorance of the impact of gate force Vortex Winds across the surface of the ground. There is an incorrect assumption that any man or beast may live in health with a military jet fighter aircraft occasionally (five times daily, both night and day) flying over at 552 miles per hour 100 feet above their heads, magnifying the extreme pollution caused by unburned particles of jet engine fuel and poison gases driven into the ground and plants by the gate force winds. These conditions constitute a series of major impacts on

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US EPA, DALLAS, TX
ASSOCIATE DIRECTOR

July 28, 1997

97 AUG -4 AM 8:13

COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.
Registered Mail

No. PC74 821242

Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

Reference: Proposed Expansion Of German Air Force Operations At Holloman
Air Force Base, New Mexico
Draft, Environmental Impact Statement, June, 1997

Subject : Complaint that USAF Public Hearings and the resultant actions
are UNFAIR.

We consider the presentation of this Environmental Impact Statement (EIS) as UNFAIR due to the lack of documentation, communication or verbal instruction as to the procedures required, and to the misleading content of the title used for this proposal. For all practical purposes, there was no public notice issued to the citizens of the Trans-Pecos Area (Trans-Pecos Area is the area of Texas north of the Rio Grande River, west of the Pecos River and south of the Texas/New Mexico border). Ordinary citizens not intimately acquainted with such proceedings do not know who to, or where to turn for counsel. The very wording of the title is misleading. Reading this "Proposed Expansion Of German Air Force Operations At Holloman Air Force Base, New Mexico" in a newspaper would not be of interest to a resident of Alpine, Texas, some 250 miles to the east. This title states this event is going to take place in New Mexico. The additional reference to "German Air Force Operations" would remove it further from the Trans-Pecos Area.

And, when we read the newspaper about a year ago, and saw "Proposed Airspace Modifications To Support Units At Holloman Air Force Base, New Mexico", this, too, would not be of much interest to a resident in Marathon, Texas, 280 miles to the east. Only those who were not confused by the USAF's carefully constructed titles of such important announcements would attend the Public Hearings, and they did. The majority of citizens in the Trans-Pecos Area of Texas did not attend due to lack of awareness. As of this date, there is finally a feeling that the USAF cannot be trusted.

The results for the 1997 EIS Draft "Public Hearings" have been as it was for the Environmental Assessments of 1993 and 1996/1997. No one will represent the citizens of the Trans-Pecos Area of Texas.


"new money" gross receipts.

- (6) Real Estate values will drop extensively in outlying areas. There is now a "hold" on development of some property until this issue is resolved. There is uncertainty concerning the future. Our investigations show bank deposits and sales tax revenues are down from 1996.
- (7) These low-level flights will foreclose on future opportunities for private business to expand. The world is coming to the Trans-Pecos Area. It is no longer "sparsely populated" as the USAF claims.
- (8) The Environmental Assessment for modification of the Military Training Routes (MTR's) in the Trans-Pecos Area, particularly Instrument Route 178, set a destructive precedent for the area. We do not wish to see this precedent continue.
- (9) With the precedent established, the potential for expanded operations are guaranteed; expansion from a small USAF, to the small complement of the GAF, then all the USAF, then all of the NATO air forces, then anyone who will buy our second-hand military aircraft. There could be billions of dollars of profits at stake for monopolistic special interest groups.

With respect to the excellent branch of our military service, the United States Air Force, our investigation indicates the USAF has not complied with the basic requirements of the National Environment Policy Act, and has, through errors, omissions and assumptions, misled the Environmental Protection Agency with the submittal of an incomplete EIS.

In our opinion, a finding of "No Significant Impact" for the referenced EIS would be completely without merit, as were the two previous Environmental Assessments.

Respectfully,


Harold Bryan Kelley, CPCM

(915) 364-2323

Business Economist

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Alpine, Texas 79831

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Attachments:

Air Quality/Special Report by Consumer Reports Magazine of August, 1997.

This will impact USAF and other jet aircraft operations by FY2003.

For detailed information, write or call the above sources.

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Sixty-four (64) people attended the public hearing on July 7, 1997. Of the ones who wrote or called the USAF for information, to our knowledge, none of them have received any information as of July 28, 1997. The only response to telephone calls to the USAF was, "We'll look into it". No return calls have been received that we know of. At the July 7, 1997, Public Hearing on this EIS, a "court reporter" recorded everyone's words. A large percentage of people filled out a USAF form to receive a transcript of this recording. As of July 29, 1997, no one has yet received it. The closing date for public comment is August 9, 1997. The delay in receiving any information is one of the reasons we are presenting this complaint that these "Public Hearings" are UNFAIR.

The USAF personnel conformed to the requirements of the governing statutes. They did not advise how to contest these proposals, nor could they answer all our questions. There is no doubt that should there be another "Gulf Oil War", or other military confrontation, the desired training of the USAF personnel in the area of low-level combat flying is essential. However, the public has certain rights and privileges that must be paramount. The United States of America is not at war. There is no National Emergency. Where may the public turn to for information and assistance in making a reasonable decision regarding a proposal by the Federal Government?

Relative to the June, 1997 referenced EIS, investigation shows there is no assessment made concerning the SocioEconomic impact of this USAF proposal relative to the Trans-Pecos Area. There was no evidence of compliance with Executive Order 12898, Environmental Justice, issued by the President of the United States on February 11, 1994.

The USAF assumes that entering certain information into the Table of Contents, then entering the same information in whole, in part, or in error, constitutes a valid study or assessment; not so. It would be the same as saying, "The building is on fire. There is a fire station around the corner." But, everyone just stands there. Nothing is done about the fire. Very incompetent administration, or perhaps an attempt to conceal the true and correct conditions.

Our investigation shows there to be a series of errors, omissions and incorrect assumptions in the USAF's calculations of the Environmental Impact Concerning Pollution and Noise. There are technical errors such as incorrect training air speeds, the confusion of Knots Per Hour with Miles Per Hour and complete ignorance of the impact of gale force Vortex Winds across the surface of the ground. There is an incorrect assumption that any man or beast may live in health with a military jet fighter aircraft occasionally (five times daily, both night and day) flying over at 552 miles per hour 100 feet above their heads, magnifying the extreme pollution caused by unburned particles of jet engine fuel and poison gases driven into the ground and plants by the gale force winds. These conditions constitute a series of major impacts on

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the environment of the Trans-Pecos Area of Texas, yet have been omitted, have errors in the technical calculations, or have incorrect assumptions made of them, as in the USAF impact study of our Biological Resources. The hearing and smelling ability of wild deer and humans is not the same.

We think this EIS is UNFAIR due to the total lack of attention paid to the tremendous impact that will be made on the Social and Economic structures of the Trans-Pecos Area. This part of the EIS was completely omitted from this EIS and questions relating to the SocioEconomic Impact were lightly passed over during the "Public Hearings". No "straight answers". There were only three of our nine questions the USAF could/would answer. We have tape recordings. We have witnesses to these "Public Hearings".

Our investigation shows that the citizens in the Trans-Pecos Area of Texas are very patriotic (or were). Comments and attitudes at the Public Hearings of 1993, June, 1996, June, 1997 and July, 1997, have shown a progressive deterioration of USAF credibility. No matter what the comments at public hearings were, the USAF gives no consideration to them. In the EA of 1996/1997 for "Proposed Airspace Modifications To Support Units At Holloman AFB", only two changes were made that we could determine. These were verified by the USAF. Neither related to comments by the public. Our investigation shows 92% of the public hearing attendees are against all three of these proposals. We are prepared to present witnesses, newspaper accounts and tape recordings. We would present court reporter transcripts if the USAF would release them.

We see no evidence that the results of these hearings, returned telephone calls or correspondence relative to this 1997 proposal will be any different from the 1993 and 1996/1997 Environmental Assessments.

In review, we reiterate our complaint that this EIS is UNFAIR:

- (1) The Trans-Pecos Area of Texas is the last frontier for many things unique and beautiful. Careful planning of development is necessary. Low-level flights by jet fighters are not part of it.
- (2) A major part of the land is Prime Farm/Ranch Agricultural land.
- (3) Our above-average Tax Rate by the State of Texas reflects this. We have some threatened and endangered species that will be impacted by these flights.
- (4) These low-level jet fighter aircraft flights will affect public health and safety. The pollution will be very high throughout the entire area. Noise will be higher than that heard from any airport or airfield. The USAF demonstrates no knowledge of information on noise for this configuration of training exercises. There will be aircraft crashes.
- (5) The regional growth will deteriorate as our economy subsidizes due to damage to our tourist business, retirement living, motion picture industry and seasonal camping/hunting income, all of which are

- 4
- "new money" gross receipts.
- (6) Real Estate values will drop extensively in outlying areas. There is now a "hold" on development of some property until this issue is resolved. There is uncertainty concerning the future. Our investigations show bank deposits and sales tax revenues are down from 1996.
 - (7) These low-level flights will foreclose on future opportunities for private business to expand. The world is coming to the Trans-Pecos Area. It is no longer "sparsely populated" as the USAF claims. The Environmental Assessment for modification of the Military Training Routes (MTR's) in the Trans-Pecos Area, particularly Instrument Route 178, set a destructive precedent for the area. We do not wish to see this precedent continue.
 - (9) With the precedent established, the potential for expanded operations are guaranteed; expansion from a small USAF, to the small complement of the GAF, then all the USAF, then all of the NATO air forces, then anyone who will buy our second-hand military aircraft. There could be billions of dollars of profits at stake for monopolistic special interest groups.

With respect to the excellent branch of our military service, the United States Air Force, our investigation indicates the USAF has not complied with the basic requirements of the National Environment Policy Act, and has, through errors, omissions and assumptions, mislead the Environmental Protection Agency with the submittal of an incomplete EIS.

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For detailed information, write or call the above sources.

July 30, 1997

FINAL DRAFT

Environmental Protection Agency
Region Six
1445 Ross Street
Dallas, Texas 75202

Certified Mail
No. P 074 821 262

**Proposed Expansion Of German Air Force Operations
At Holloman AFB, New Mexico**
Draft, June, 1997, Environmental Impact Statement

Attention: Mr. Robert Lawrence, Mr. Joe Swick and Mr. Mike Jansky

Dear Sir,

Please accept this as my complaint against the Proposed Expansion of German Air Force Operations At Holloman Air Force Base near Alamogordo, New Mexico.

Find below a summary of our analysis of this Environmental Impact Statement (EIS) done by the United States Air Force (USAF) for the referenced project. We have analyzed the June, 1997 EIS and have constructed a "cross analysis of an Environmental Assessment document titled 'Proposed Airspace Modifications To Support Units At Holloman Air Force Base, New Mexico, 1996/1997' in order to show a Progressive Relationship between the EIS and the EA. We have investigated an EA, 1993, for de facto lowering of IR-178 on the El Paso Sectional Aeronautical Chart. We need a copy of this 1993 EA. We think this 1993 EA lowered the altitude of IR-178. Is it possible for the Environmental Protection Agency to furnish us with a copy?

With the compounding of our discovery and the proposed expansion of Instrument Routes and Visual Routes, we feel it is time to initiate a complaint with the Environmental Protection Agency (EPA).

We are concerned about several claims and omissions made by the USAF that are not reasonable. Our group includes an Aeronautical Engineer, a Medical Doctor, an Economist, a Psychologist, an Animal Scientist and a Law Firm. We all have extensive formal education and experience in our respective fields. We consider ourselves to be reasonably competent in making an analysis of the EA and the EIS.

Please advise if there are any administrative steps we have not followed in order to implement a viable complaint concerning the lack of a complete and reasonable study of these proposed acts by the USAF in the Trans-Pecos Area (West of the Pecos river from the New Mexico border to the Rio

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Grande). We would like to thank Mr. Joe Swick for his assistance, and for any assistance his associates may have contributed.

This EIS for Proposed Expansion Of German Air Force Operations At Holloman AFB, New Mexico, is the next step in compounding what we consider to be a gross error. The error is in using six or seven Instrument Routes (IR's) and Visual Routes (VR's) in this area for any low-level training flights, much less additional low-level flights. We also have determined that the entire process of Notice of Proposed Action, Public Hearings and comments has been conducted in an unfair way to the public.

Analysis of referenced proposed action by the United States Air Force (USAF)

We have obtained USAF documents of this EIS and will follow them by using the Table of Contents as shown on page 'iii'. We will reference this EIS by page, paragraph and line number. Any claims or statements made in this analysis that are not in writing will be identified by the words, 'Hearsay evidence'. These claims and statements are verbal, and may, or may not, be supported by witnesses, letters or news articles.

4.0 ENVIRONMENTAL IMPACTS, Page 4-1

4.1 AIRSPACE USE AND MANAGEMENT, Pg. 4-1

4.1.1 Proposed Action, Pg. 4-2

In the past, in the present and probably in the future, Airspace Use and Management has been and will be the weak part of these training programs. We in the Trans-Pecos Area have no knowledge of the management at Holloman AFB the gunnery ranges or other low-altitude flight IR's and VR's.

The management we see is based on the very old Army premise of 'I does what I likes and I suits me. Completing the mission is everything.' Fighter pilots are by nature experimental and aggressive. They must be thus. We accept this, but not the non-recourse irresponsibility of windmills torn up, gates blown down, livestock stampeded, wild animals injured or killed, roots blown off, vent stacks demolished and people knocked down, or run off the road. All this by the combination of sound and wind energy. There is no recourse to correct these actions other than the USAF's 'We'll look into it'.

Then, we have a statement in the last paragraph (para.) page 4-3 concerning Refueling Routes. This has training for the PA-200 GAF fighter pilots refueling at 19,000 and 18,000 feet at Mean Sea Level (MSL), then in

the first para on page 4-4, we move to 12,000 and 18,000 feet MSL, then we have the PA-200 GAF fighter refueling at 1,000 feet AGL. On page 2-12 we have the first mention of the PA-200 fighter refueling at 1,000 feet AGL, and the first mention of the PA-200 fighter refueling another PA-200 fighter at 1,000 feet AGL.

In the EA of 1996/1997, there is no mention of the 1,000 foot refueling altitudes. These variations are also found within each proposal. It makes us wonder what the USAF is really going to do. We have discussed the 1,000 feet refueling exercise elsewhere in this analysis.

It is our opinion that is a progression of events, so far in three tiers, of a plan to eventually establish, maintain and perpetually operate an international training facility for, at present, refueling fighter-jet-aircraft-to-fighter-jet-aircraft, low-level (100 feet AGL or less) stealth flights, 300 AGL or less, fighter/pursuit air-to-air combat and conventional high-altitude refueling.

So far in our investigation, we have found a well organized, very persistent effort by the USAF to consummate this program. We are aware, through 'hearsay evidence', there are multi-billions of dollars profit at stake, which makes this a difficult training program to stop, if at all possible. For more detailed information, contact Harold B. Kelley for a copy of a presentation made to the National Federation of Independent Business, titled 'The Mayflower Mafia' (Copyright 1988).

4.1.2 No-Action Alternative, Pg. 4-5

No Action on implementation of this proposal recommended

4.1.3 Cumulative Impacts, Pg. 4-5

To start, more of the German Air Force, then the United States Navy and Marines, then seven to nine USAF training bases moving this type low-level training to Holloman AFB, then the facility goes on a national basis, and all military low-level flight training is established over the MTR's of West Texas. The last, and final step is to go international, and have all of the North Atlantic Treaty Organization (NATO) aircraft, plus all our other military allies aircraft training here. This is what our USAF consultants have advised us. The potential to cause violations of environmental laws and regulations is endless.

There are dozens of documented accounts of damage to livestock, windmills, buildings, wild animals and people. Other than animals and birds, no human deaths have yet occurred. Some years ago, the USAF paid for the destruction of windmills, but not lately. It is best that the USAF fly at least 1,000 feet AGL over private property, homes, businesses or public highways. The destruction by sound energy and gale force winds, the automobiles run off highways and the sleepless nights, are numerous enough to cause chronic,

artificial, extreme mental tension. There seems to be no recourse for citizens in the Trans-Pecos Area.

4.2 NOISE, Pg 4-5

4.2.1 Proposed Action, Pg. 4-13

This part of the EIS draws the most attention from the USAF and the public. The USAF is in a noisy business. The modern jet aircraft generates a tremendous amount of noise energy.

The three experiences I personally had, went something like this: (1) In April of 1996 at about 1:30 pm while working on a flat-bed trailer at the barn, there occurred a sudden explosion, then a roar that diminished and became a fast moving jet aircraft. There was no warning. The noise made my ears ring, the gale force winds made me stagger, and I had dirt in my eyes. Fortunately, the barn broke up some of the noise energy and the wind. (2) In May of 1996, at about 4:30 pm, while working in the open on some water well controls, there was a slight buzzing sound for a split second, then another explosion of sound and air. There was no warning as this jet aircraft came directly over me. The combined energy and gale force winds knocked me off my feet, blew dust, twigs and grass in eyes and nose, down my shirt and stung my face. Then the roar diminished as the jet fighter flew off. I picked myself up and pulled the thorns from my left hand. Then I got curious about the source and purpose of these jet aircraft.

(3) The third incident occurred three days later while I was walking toward the job-site to take measurements. This time, there was a split-second roar to a crescendo, a blast of sound, but no wind. This was a USAF jet fighter aircraft that passed about 250 feet to the east of me, close enough to the ground to stir up dust, whip the tops of juniper brush around, and then drop down out of sight through a cut in the hills into the lower elevations of the Alpine, Texas area. My property is 5,400 feet elevation MSL.

One of the plus factors of an air-to-ground attack aircraft is their ability to surprise the enemy target by flying supersonic, or almost so, at low altitudes. This is an asset in a war zone. As we use to say during my nine years and two wars in the U.S. Army, "A War Zone is a nice place to visit, but who wants to live there?" There are dozens of similar documented accounts the same as mine.

On page 4-7, Table 4.2-1, we have the same non-applicable information put forth in the EA of 1996/1997, and probably in the EA of 1993. All the engineering information on sound in this EIS has no relation to the flights over IR-102/141 or IR-176. Our aeronautical engineer has made a careful study of this information on sound and has determined it is not applicable to this

assessment of IR-102/141, or IR-176. All this data is based on sound (noise) relative to an airfield or air base. In this instance, a USAF air base.

The formula for the A-weighted sound level is not applicable to the sound level of a 45,000 to 60,000 pound aircraft traveling at 515 to 552 miles per hour (just below supersonic speed) at 100/300 AGL. The sound level does not increase to a peak and then diminish. This means there is no warning of an increase in sound. As mentioned above, this is one factor (surprise) that will make this ground support aircraft effective. There is a sudden explosion, then a decrease in the sound. There is even a technical term used in this assessment of sound that would ask us to believe we should take this 130 decibels (if that figure is true and correct) generated by an F-4 jet aircraft and spread it over a thirty day period. The technical term is "Onset Rate Adjusted Monthly Day-Night Average Sound Level".

The equally important engineering factor left out of this EIS, the EA of 1996/1997 and probably the EA of 1993, is the wind velocity generated by this 60,000 pound mass traveling at 552 MPH. The sound will make your ears ring (indicating physical damage), and may rattle the dishes off the shelf, but after the blast of noise startles you, the wind velocity is what knocks you down, causes cuts and bruises, causes bone-breaking falls, and can blind you or even cause death under some circumstances. At 60 to 70 MPH on the open highway, it can throw your vehicle out of control, causing one-car or motorcycle accidents. Yet, the gale force wind is, to our knowledge, not addressed anywhere in the progression of EA's and EIS.

4.2.2 No-Action Alternative, Pg. 4-21

No Action to be taken on this proposal

4.2.3 Cumulative Impacts, Pg. 4-26

There is a reasonable explanation for so many non-applicable engineering exercises. They apply to a known environment; an airfield, or gunnery range. Not to 100/300 feet AGL flights over long MTR's. No matter how you make the myriads of adjustments using a wide, non-related variety of formula and charts, the facts are that a streamlined mass of 60,000 pounds, traveling at 552 MPH at 100 feet AGL, creates a unique physical reaction of explosive sound and air movement that human and animals are not naturally exposed to. It's a law of physics. It's a destructive force.

There is no known study in any of these official documents concerning the Environmental Impact of aircraft (one or more) flying at such unprecedented low altitudes. Unlike Air Quality, Socioeconomics, Biological Resources, and most other Sections of this EIS, this issue has not been addressed by the USAF relative to the MTR's. All information in this EIS,

1997, relates to airfields and other prominent aircraft zones of operation. The fact is, not one of the states in the United States and not one of the NATO nations wants this program. That should tell our government something.

4.3 LAND USE, Pg. 4-33

4.3.1 Proposed Action, Pg. 4-33

On page 4-45, last para., the USAF states, in a mixed-up way, "However, relative increases in noise and potential overflights experienced in portions of -- -- West Texas would appreciably alter the natural quiet for scattered rural residents." This has already been addressed in our analysis. The fact is, the increase in noise from present overflights has already damaged the lives of hundreds of people in the Trans-Pecos Area, and can only get worse. On page 4-45, the USAF blandly states in para. (1) that things will get louder and windier in para. (2) the repulsive conditions will expand; in para. (3) and (4) they continue with the bland statement that the noise will be irritating and eventually damaging.

The most prominent piece of information that is included in all these different areas of impact is the apparent total lack of knowledge of the preparers, or the lack of ethics. Unfortunately, the results are the same. Each preparer should agree to stand on a bare piece of ground, without ear plugs or muffs, and feel the tremendous energy of that much sound and wind. Not once in a life time, but continuously, at irregular times. This is now occurring in West Texas. This is extreme, chronic, artificial mental tension, the most unhealthy environment known to humans.

4.3.2 No-Action Alternative, Pg. 4-45

No Action to be taken

4.3.3 Cumulative Impacts, Pg. 4-45

These flights are, in addition to the above negative facts, an invasion of privacy and private property. They should be stopped as soon as possible, and the minimum altitude for any jet fighter aircraft should be set at 1,000 feet AGL. It isn't a question of damage, it's a question of how much damage.

4.4 AIR QUALITY, Pg. 4-47

4.4.1 Proposed Action, Pg. 4-48

Few of the technical words in this section have very little relevancy to the subject of Air Quality as it applies to this EIS. Our opinion is the thrust of this EIS is to show little or no pollution at or near ground level. No one

wants Alamogordo to be like Albuquerque, New Mexico. Once above 5,000 feet AGL, no one seems to care what the USAF dumps. The variables in the computations using the various Tables in the use of "Models" "Averages" and "Weighted Averages". These "Models" can be manipulated to "show and tell" any information that is required relative to emissions discharge. As noted in Section 4-2 on Noise, the USAF owns and operates some very dirty machinery. In order for the USAF to meet established standards of emission control, whatever they may be, something must be done. Let us say we are analyzing a USAF PA-200 Tornado jet fighter.

1. Motor is idling - - - - - X lbs. of CO, NOx and Particulates for 10 minutes
2. Taxi to the runway - - - - - XX lbs. of CO, NOx and Particulates for 10 minutes
3. Full throttle, take off - - - - - XXXX lbs of CO, NOx and Particulates for 3 minutes
4. Cut back and Cruise - - - - - XXX lbs of CO, NOx and Particulates for 2 hours

With this set of variables, we have a wide variety of information. The question is, what information shall we publish? We have four different operating functions of this PA-200, four different throttle settings and four different time frames. The one factor missing is: what is the air speed? 360 MPH? 552 MPH? The faster they fly, the more emissions. The lower the AGL, the more ground level pollution. We find no air speeds in this EIS that are applicable.

To help negate the effect of Surface-to-Air Missiles, it is necessary to fly these routes at, or near, the speed of sound. This high speed will use more fuel and generate more pollution than calculated by the USAF. We assume the USAF will not train these pilots at other than actual combat conditions.

It is a simple matter to create a "Model" from all the known values involved. Like standing on "spot A" while a five gallon bucket of water is dumped from 5,000 feet AGL on your head. Or, five gallons of water from 100 feet AGL on your head. Which one will get you wet? Which flight will pollute the ground? Neither the 5,000 foot bucket of water nor the pollution from the 5,000 foot flight will reach the ground. See page 4-51, para. "Summary Of Aircraft Emissions", line 8. The USAF seems to have no information to determine the actual effects of pollution or noise/wind from a 60,000 pound jet aircraft flying at 552 MPH at 100 feet AGL. We have searched this EIS, 1997, the EA, 1996/1997 and other sources of such information, and can find no study concerning these training conditions; nothing of a combination of an explosive sound/wind combination. We need the EPA's help on this.

The Trans-Pecos Area of Texas is going to get very polluted from the 5,000,000 tons per year of CO & NOx dumped on us at 100 feet AGL. Neither the ranchers, hikers, vacationers, Sierra Blanca, Van Horn, Marfa, Alpine, Marathon or Fort Davis will be able to smell the Mountain Clover. The stink

won't happen this year or the next, but the worst is yet to come. Even now, when a heavy dew rises on some mornings, you can still smell the "xerosene" in the grass from the "boomers" that hit here in 1996. These MTR's cover 10,000 plus square miles of private land. That's 10,000 square miles of pollution.

We did determine that with the present number of aircraft, plus the 30 additional GAF PA-200's, the 19.2 sorties per day of jet aircraft will equal the air emissions of 1,660 automobiles per day driving the long loop of IR-102/141 or IR-178. Some of the USAF Tables and technical language do not relate to each other. Some are simply contradictory to each other. There is a mixture of miles per hour and knots per hour. Mixing of these two factors indicates the Corps of Engineers has a shortage of technical writers. This exercise on "Air Pollution" is the same type exercise as the one on "Noise".

One thing we did determine is, when taking the different tables, assigning the correct air speed of 480 knots (552 MPH) and other factors set forth in the USAF's statements in other sections, the amount of polluting discharge will increase by a factor of 41.1% over what the USAF shows. Of course, we are never sure if the base values set out by the USAF are true and correct, the polluting factor could be higher. But we always use the data from this EIS.

The largest short term term pollution will be greatest at Holloman AFB due to the large amount of combined aircraft, motor vehicles and stationary motors. The pollution we are concerned about is the long term pollution of tons of poisons and particles of unburned fuel released in the air and on the ground here in the Trans-Pecos Area.

4.4.2 No-Action Alternative, Pg. 4-62

No action on this EIS is necessary.

4.4.3 Cumulative Impacts, Pg. 4-67

The pollution factors will rise in proportion to the number of sorties flown by the USAF over IR-178, IR-102/141, and of course the MTR's flown in New Mexico. We know there are homeowners, ranchers and other business people in New Mexico complaining of the existing noise and pollution.

Again, there is no known study shown in any of the official documents, concerning the Environmental Impact of aircraft (one or more) flying at such unprecedented low altitudes. As with the Noise Level, the pollution of the air, land and all other Sections of this EIS have not been addressed by the USAF. All information in this EIS, 1997, relates to airfields and other prominent aircraft zones of operation. Again, not one of the states in the United States, not one of the NATO nations, want this program. That should tell our government something.

4.5 BIOLOGICAL RESOURCES, Pg. 4-67

4.5.1 Proposed Action, Pg. 4-67

This assessment is fraught with some basic misconceptions. Among our group of analysts are some outdoorsy women and men. Some are hunters, some of us combine hunting with just watching wild animals. One thing we all agree on is an unnatural, chronic disturbance of a wild animal is cause for it to leave the area, if it can. It does, of course, depend on the availability of the proper food, ample clean water and shelter, the same as for us humans.

For whatever reasons, the USAF has, more or less, ignored basic facts of nature. The USAF should read all the works of Dr. Desmond Morris, Zoologist. There will definitely be a migration of mobile animals from these IR's and VR's. If they could, all domestic livestock would also leave. They are generally fenced in.

We know most of the opinions by such authorities as our Fish and Game Department, or the Texas Parks and Wildlife Department. However, in our conversations over the past forty years, we have discovered even the well-educated, Government Employed Naturalists lack the experience of application of their education. A formal education is a rough diamond. The experience of application is the polish.

Members of our group have the formal education and experience with animal behavior, genetics, veterinary and allied studies of domestic and wild animals. The authorities quoted in this EIS are only partially correct in their statements.

We have had extensive education and experience in operating one of the first Game Ranches in Texas, in the 1950's and 1960's, for the purpose of Lease Hunting of Quail, Mule Deer and Javalina. We have studied the migration and habits of all animals in this area, game animals or not. We found we accumulated a large deer herd, large coveys of quail and javalina due to the lack of any disturbance by alien (unnatural or unusual) presence or activity. There was no livestock on the 43 sections of ranch land.

A week before hunting season, preparation of facilities increased the alien presence of vehicles and people. Everything is relative with wild animals. They are very attuned to sight, sound and smell. We've watched mule deer slowly walk off as far as twelve miles because of the alien noise of tapping two small rocks together. During hunting season, the influx of vehicles, camping noise, laughter, conversation or just the click of twigs and rocks can cause large migrations of deer, elk and javalina.

This is before the occasional noise of high-powered hunting rifles. When the shooting starts, most mature deer, quail, javalina, coyotes, bear, mountain lions, all the smaller cats and even some porcupines and badgers

will leave. Occasionally, they will not leave an area for any reason. The variables have to do, of course, with survival. In high and normal rainfall years, we found our game herds would scatter off of the 43 sections of land. In normal and low rainfall years, they wouldn't leave unless very stressed. For the wild animals, this 43 sections was a known factor of ample water, feed and shelter. Oh yes, four families of mountain lions hunting the 43 sections would deplete all types of wildlife within six months, either by killing or from migration.

During the off-season of hunting, we had vacationers, campers, hikers and other outdoor types of people use the 43 sections of land. We would not charge any admission other than a cleaning fee. We allowed no trash or chemicals on the ranch and kept 5 windmills in operation year round. We insisted on scattering our off-season visitors for the purpose of balance. We found that if there was no activity within the 43 sections of land, a large percentage of wild animals from the surrounding ranches accumulated on the 43 sections of Game Ranch Resources, and we had over-populations that caused overgrazing. Ranchers must practise range management of wild game animals as well as for livestock. All animals, humans included, will congregate where there is peace and quiet with ample food, water and shelter.

When we read, or hear, the opinions of the state and federal Fish & Game authorities, or read in this EIS what the USAF thinks will occur to the Biological Resources, we realize they lack the polish of their education.

All animals respond to alien occurrences in different ways. Deer will walk away; sometimes for 10 or 15 miles. Quail will do the same. Coyotes will adapt to almost anything. Wolves will move out of an area reluctantly, as will mountain lions, bob cats and civet cats as they follow the animals they prey on. Elk will migrate. Skunks are immune to anything but rattlesnakes. Most game animals and birds will migrate, thus causing a reduction in income to domestic and game ranchers that have Lease Hunting. All animals can be conditioned to accept unnatural environments, but always at the cost of their health. No one will ever win an argument with Mother Nature. Remember Dr. Pavlov's experiment with dogs? They all died of ulcers.

Hunting leases constitute a large proportion of income in today's Trans-Pecos Economic Environment. Some ranching operations could not exist without it. Some ranchers have limited lease-hunting rights. They don't like leasing due to the intrusions of strange people, or destruction/damage to livestock and facilities, but about 97% of ranching businesses have hunting lease income.

4.5.2 No-Action Alternative, Pg. 4-82

No Action of this proposal is required

4.5.3 Cumulative Impacts, Pg. 4-82

We only have information relative to the 13 years of low-altitude flights along IR-176 concerning the improvement, or depletion, of Biological Resources. It definitely would be very beneficial for the EPA to use this MTR as an experimental area for educational purposes.

We have contacted 11 ranchers who have been greatly abused by the low-flying jet aircraft for these 13 years. Some of them are agreeable to taking part in such an experiment and some are reluctant to do so. The reason for this attitude in the confusion between the EPA and the Endangered Species Act (ESA).

Most ranchers don't want any wildlife authorities on their land. They fear, and justifiably so, the disruption of their private business, and possible loss of property.

However, we have been able to obtain a large amount of information, most of it outlined above. The consensus is:

1. Contrary to the USAF, all biological life forms are damaged by these low-level flights. Reality is, jet fighters flying at 100 feet, or 300, or 500 feet are just too low for natural life forms to tolerate. 1,000 feet should be the minimum for modern jet aircraft with noise and pollution levels that are above those of the military jets now flying out of Laughlin AFB, Del Rio, Texas. We can find out what type aircraft they are, if you need to know. We think they are the T-38 and the AT-38.

2. IR-102/141 passes over the only herd of Elk in Texas located just west of the town of Marathon, south of the Glass Mountains. There are some Elk in the Guadalupe National Park, but they are mostly in New Mexico. The beginning of this herd of Elk was privately introduced in the late 1950's, and now numbers some 25 head and growing. Low-level flights over the wide valley and mountains they range in would be destructive to this Elk program.

3. The operation of these large, powerful jet fighter aircraft are not compatible with any environment but warfare. They were designed and built for that.

4. As set out above, there is no known study, in any of the EA's or the EIS relative to this low-altitude training program. In these official documents concerning the Environmental Impact of aircraft (one or more) flying at such unprecedented low altitudes, the USAF has created a new problem. As with Air Quality, Socioeconomics, Noise Levels, and all other Sections of this EIS, little has been addressed by the USAF relative to the MTR's and the 10,000 square miles they fly over. All basic information in this EIS, 1997, relates only to airfields and other obvious aircraft zones of operation. Again, not one of the states in the United States, not one of the NATO nations, want this training program.

4.6 ARCHAEOLOGICAL, CULTURAL AND HISTORICAL RESOURCES, Pg. 4-85

4.6.1 Proposed Action, Pg. 4-85

We have heard nothing from any of the Archaeological, Cultural or Historical organizations listed in the EIS, 1997. We will contact them a second time. Mr. Hugo Gardea of the Texas Historical Commission has not yet been contacted but his staff has. Our conversations with his staff generated interest in the situation, and they too have had no response from the USAF relative to their request to be advised of the progress of EIS, 1997.

4.6.2 No-Action Alternative, Pg. 4-92

Recommend no action for this proposal

4.6.3 Cumulative Impacts, Pg. 4-92

We can find no letters of response from the USAF to the Texas Historical Commission concerning this proposal.

4.7 WATER RESOURCES, Pg. 4-92

4.7.1 Proposed Action, Pg. 4-9

We do not know of any impact on the surface or underground water sources in the State of Texas. This EIS, 1997, is a study concerning water, in New Mexico, that is available to the city of Alamogordo and Holloman AFB. We have no knowledge of the aquifer draw-down capacity, the supply system or the other mechanics. However, we can find out if this is important.

The only comments we have heard concerning water is the destruction of windmills that supply water to livestock and wildlife in Texas. These are always repaired or substituted for in a short time by the owners.

4.7.2 No-Action Alternative, Pg. 4-96

No action is recommended for this EIS.

4.7.3 Cumulative Impacts, Pg. 4-96

The EIS, 1997 indicates that there is a limited amount of water in the area of Holloman AFB, and the water table is dropping. The available water in this aquifer will become saturated with gypsum should there be too extensive a draw-down. This is true of any water source in the area of White Sands National Monument (Gypsum Dunes) We are told (hearsay evidence) this

area is a large Geologic Depression that gets run-off water from the surrounding mountains to recharge the relatively small aquifer.

4.8 HAZARDOUS MATERIALS AND WASTE MANAGEMENT, Pg. 4-98

4.8.1 Proposed Action, Pg. 4-98

We have no comment on the Hazardous Materials and Waste Management. There was no comment made concerning any poisons along the MTR's other than the tons of fuel particles, the CO and NOx. Then we have the new addition of jet fuel spills from the PA-200's refueling each other.

4.8.2 No-Action Alternative, Pg. 4-100

We recommend a No Action decision on this EIS.

4.8.3 Cumulative Impacts, Pg. 4-100

4.9 SOCIOECONOMICS, Pg. 4-101

4.9.1 Proposed Action, Pg. 4-101

There is no part of any of these EA's or EIS concerning the Social/Economic Structure of the Trans-Pecos area of Texas. The USAF consistently ignores the social structure, minority races and the depressed economic status of the majority of the citizens of this area in direct contradiction to:

- (1) Presidential Executive Order #12896, Environmental Justice, page 3-121, para. 3.9.8 and Figure 3.9-1, page 3-122
- (2) The fragile economic balance between an expanding economy versus a subsistence, or decreasing economy.
- (3) The economy of any Trade Area depends on the ratios of "new money" to subsistence income. At the present time, the Trans-Pecos Area is primarily an agricultural community, but with several incentive programs managed by a combination of the Texas Commerce Department, private donations in the Trans-Pecos Area and a newly established local organization, we now have a growing "trade area. This USAF training program is directly counter-productive to all our efforts. Detailed information of our accomplishments is available on request.

In order of cash-flow volume of "new money" into this Trade Area, the following are the known sources:

- A. Cattle, sheep, goat ranching, hunting/camping leases

- B. Sul Ross University, Texas University System
- C. Retirement population/new construction
- D. Welfare recipients
- E. Tourist Visitors
- F. Southern Pacific Railroad Employees
- G. State and Federal Employees
- H. Motion Picture Industry

4.9.2 No-Action Alternative, Pg 4-105

No action of this proposal required

4.9.3 Cumulative Impacts, Pg 4-105

The retirement and tourist economies have been on the rise the past 5 years. For a while, there was a decrease in these two "new money" sources. It could have been the national economy, or it could have been the drought. We doubt it was related to USAF actions along the MTR's in the area. That will come later. The "town people" of Alpine, largest town in the Trans-Pecos Area, (population 4,400) have yet to experience a "fly-over" as the majority of citizens have. The town people have yet to grasp the concept of the eventualities.

We have had three motels built in the past three years. When interviewed, the managers informed us their studies indicated there would be an increase in occupancy from three sources: (1) The increase in enrollment at Sul Ross University brings more friend and family related visitors, and (2) the vacation overnight facilities at Big Bend National Park would not be expanded due to cuts in budget by the National Park Service (NPS), and the controversy over NPS service contractors, (3) There are more day hikers and campers in the surrounding country side.

Outside the towns, private land owners are planning additional business enterprises. As an example, there is 718 more new construction than in Alpine, Texas. Cattle, sheep, goat ranching, hunting/camping leases business enterprises have plans (hearsay evidence) to provide destination facilities for camping vacationers. These camp grounds will be constructed in some very beautiful, high altitude country. Some initial plans are for a number of very well arranged campsites with electricity, potable water, rest rooms, showers and access to hiking and helping ranchers with their goat, cattle and horse operations. All this at a cool summer altitude of 4,400 to 5,400 feet AMSL. These are mostly small areas for families (No ROA's). There are also plans for apartment and office building in scattered, rural locations.

The present impact of low-level training flights by the USAF has been noticed by various tourists, hunters, campers and mostly by the private businesses related to outdoor activities as well as the ranching businesses and the ranch employees.

There is another tier of SocioEconomic Impact. With the progressive expansion of these sorties up to approximately 22,252 per year, 89 per day, the danger of highway accidents will increase, as will accidents to ranchers, ranch employees, hunters, bikers, campers and eventually to residents of the towns in the area. Then, as has occurred in New Mexico, the USAF will decide it would be good training for the NATO air forces if these pilots could do training at super-sonic speeds as well as sub-sonic. Then, with so much "Mega-Bucks Business" at hand, NATO, or the USAF, would discover a need to increase the numbers of IR's and Visual Routes (VR's).

As the Colonel at the July 7, 1997 "Public Hearing" in Alpine stated, "This training program will go on indefinitely."

The USAF started this training program on a small scale with only IR-178 "modified" from a minimum of 500 feet AGL down to 100 feet AGL. Again, with the weight (45,000 to 60,000 pounds), the speed 500/552 miles per hour (MPH), the high noise level with the gale force winds generated, the minimum height should be raised from 500 feet AGL to 1,000 feet AGL.

4.10 TRANSPORTATION, Pg 4-106

4.10.1 Proposed Action, Pg 4-106

No Comment

4.10.2 No-Action Alternative, Pg 4-108

4.10.3 Cumulative Impacts, Pg 4-108

None to the Trans-Pecos Area

4.11 UTILITIES, Pg 4-109

4.11.1 Proposed Action, Pg 4-109

No Comment

4.11.2 No-Action Alternative, Pg 4-113

4.11.3 Cumulative Impacts, Pg 4-113

None to the Trans-Pecos Area

4.12 SOILS, Pg 4-113

4.12.1 Proposed Action, Pg 4-113

No Comment

4.12.2 No-Action Alternative, Pg 4-118

No comment

4.12.3 Cumulative Impacts, Pg 4-118

None to the Trans-Pecos Area

4.13 SAFETY, Pg. 4-116

4.13.1 Proposed Action, Pg. 4-119

To quote one citizen's letter to one of our member's, "These guys moving at 300 or more knots (official speed is 480 knots) will not have a chance to detect any other aircraft in their path, especially at very low levels where they plan to fly. I fear that sooner or later they will encounter a rancher pilot looking for cattle, or a helicopter working cattle, or a pipe line patrol aircraft, or a border patrol flight, or a glider, or any of the many other legitimate and legal types of aircraft using the same area. If and when they do can you imagine the outcry that will take place from the public? Another forty (30 additional) aircraft taking part in these training flights will multiply the danger to a very large extent."

There is a genuine threat of danger in these low-level flights. Instrument and "fly-by-wire" only at 100 feet AGL, and air-to-air combat exercises at 300 feet AGL. Some of these will be well trained, and sometimes experienced pilots, sometimes not. Our USAF advisers (hearsay evidence) inform us that of the two, the air-to-air combat is the most dangerous. It will be manual control, not instrument. When flying even light aircraft, the instruments (automatic pilot) can out perform the human.

In the instrument training flights, (hearsay evidence) the exercise is designed to force the pilot to surrender control of a progressively faster moving aircraft, with progressively closer proximity to the ground, to some control other than her/himself. Psychologically, this is difficult for some fighter pilots.

Crashes will be inevitable. At these low altitudes, should the machine malfunction, the pilots are trained to attempt an altitude rise in order to eject. There would be very little time for an attempt to correct the malfunction. The pilot is a more valuable asset than the training aircraft. Conversely, the pilot/aircraft combination is a more valuable asset than the civilians. (See Code of Military Justice, The Articles of War)

The final question is, where will the aircraft crash? ("Auger in" is the term.) The over-all damage to the environment will be small, but long-lasting. Of more concern to the environment are the thousands of hours of aircraft operation. At 100 feet AGL, the smell of burnt jet fuel lingers for two to three days, according to the wind. The vortex of air generated by the jet engine forces the hot gases and particulates to the ground in a circle.

Experience at constructing or modifying runway or approach lights at USAF air bases displayed the resulting damage of these exhaust gases even from small trainers like the AT-38.

Again, there has been a previously unannounced addition to the proposed training flights. The EA of 1996/1997 for airspace modifications did not include an intent to refuel the PA-200 Tornado at 1,000 feet AGL by USAF tanker craft. Nor did it mention the intent to refuel the Tornado from another Tornado (The Buddy-Buddy System) at 1,000 feet AGL. Section 4.0, page 4-4, para. 1.

We are advised by our Aeronautical Engineer and USAF advisor that there will be frequent inabilities to accomplish this refueling maneuver with thousand of gallons of fuel spilled. The purpose of high-altitude air-to-air refueling is the smoother air and the margin of safety from obstacles, such as the earth.

Again, as in the EA of 1996/1997, the USAF has made no assessment of the property or people under and around these low-level flights. The safety of the population, the damage to property and the irritation of no sleep at night have gone unaddressed.

4.13.2 No-Action Alternative, Pg. 4-124

No action is recommended

4.13.3 Cumulative Impacts, Pg. 4-124

(1) Uncontrolled crashes of aircraft in excess of USAF estimates, (2) fuel spills from hazardous maneuvers and (3) the safety of the owners and employees of the homes and businesses under and around the low-level aircraft.

5.0 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES, Pg. 5-1

This section has only one reference to the Trans-Pecos Area. The reference to "Short-term uses of the human environment and the maintenance and enhancement of long-term productivity." If this were really a short-term training program, under some conditions this program might be acceptable as there could still be long-term productivity. However, as the USAF Colonel said, this program has no end that the USAF knows of.

The 6.0 REFERENCES, Pg. 6-1

Our investigation and analysis (I & A) indicates that, as stated by the USAF in the EA of 1996/1997 and the EIS of 1997, there is to be a continued expansion of this training program. Our I & A also indicates that in reality, the USAF will have no concern for the welfare of citizens living in the Trans-Pecos Area. Wh₁ base this opinion on the following facts:

1. We have found many people who have complained about the noise, gate force winds, the fumes of "terose" from the jet motors, and the loss of windmills and livestock associated with these training flights. We know no one who has received any return calls from the USAF, or anything in writing. The calls to the number they give out meet with a, "We will look into it," then silence.

2. We have numerous witnesses from the towns of Alpine, Sierra Blanca, Fort Davis and their surrounding areas, and satellite developments that the USAF does not fulfill their stated policy. Contrary to the statements in this EIS, they do not, and we quote, "fly at a higher elevation over the towns, or over ranch residences, county sub-divisions and commercial buildings". We have various sources of USAF information (hearsay evidence) that advise us the USAF, as they state in the 1996/1997 EA and this 1997 EIS, will train pilots in nine additional type USAF aircraft on IR-176 and IR-102/141. We have information that the United States Navy (USN) and their subsidiary service, the United States Marine Air Corps (USMACV) will also train over these routes. These sources also advise us North Atlantic Treaty Organization (NATO) countries, other than the German Air Force (GAF) will train over these routes. NATO countries are contracting with the United States Government (USG), through the USAF, to train their military pilots over these same routes, and they will be based at Holloman AFB. The intent is for Holloman AFB to be a national/international center for this training program.

We have been advised by the USAF (hearsay evidence) that this low-level type training has been ejected from England, Germany and the State of Virginia. In addition, (hearsay evidence) there are now 7 to 9 USAF training bases in the United States (US) that will move their low-level training flights to Holloman AFB due to local objections to this training program now in operation.

4. We have been advised by legal counsel that these flights on IR-176 and IR-102/141, flying at 100 feet AGL, fly more through developed, private property than over it. These routes encompass, as now indicated, over 10,000 square miles (SM) of private property. These flights constitute illegal trespass over that 10,000 SM area.

5. The USAF does not know the effect on humans, or other biological life forms, of any 60,000 pound, fighter/bomber jet aircraft flying 100 feet AGL and at 480 knots per hour (552 MPH). We have searched for this information in this EIS and the 1996/1997 EA, and can find nothing related to these flying conditions.

Either we can't find this information in this EIS, or the EA, or there has been no formal study of these conditions for training, or the USAF, through

the Department of Defense (DOD) and the Federal Aviation Administration (FAA) know nothing about these conditions, or they are not publishing what they know.

CUMULATIVE IMPACTS FROM OUR GROUP ANALYSIS

In this USAF document, in each of the above categories listed in the index under 4.0. ENVIRONMENTAL IMPACTS, we find very little discussion, reference or awareness of the Trans-Pecos Area. There has been no Socioeconomic assessment done for this part of the EIS.

In each of the categories listed in the index, under the heading of ENVIRONMENTAL IMPACTS, we find the repeated statement that there will be no impact, destructive or constructive, for the areas of Texas that are under IR-176 and IR-102/141. This 10,000 plus square miles will be highly impacted. It is not a question of will there be damage to the environment in this vast area. It is only a question of how much damage there will be.

There has been a premeditated progression of interactive components to one final Military/Economic organization that will create an international low-level training site in this area of the United States. This program will earn billions of dollars for private corporations through the sale of war equipment and materials, and will strengthen the US world dominance of political and economic power.

We have not addressed the issue of Private Property Rights, as it is not a part of this EIS. This subject alone is an extended study of the 10,000 plus square miles of "taken" private property, without permission. This constitutes an illegal act of trespass, and possibly robbery. Neither has the subject of fraud been addressed as it relates to the omissions, errors and assumptions of the EA, 1993, the EA, 1996/1997, and the EIS, 1997. Neither are these a part of the EA's or the EIS.

The following are major parts of this complaint. We have used the available technical information published by the USAF in this 1997 EIS, and the 1996 EA, to formulate the above opinions.

4.1 Airspace Use And Management

Lack of correct management by the authorities at Holloman AFB is demonstrated in the conduct of the pilots in training. There are numerous documented accounts of accidents caused by these low-level flights, loss of sleep, difficulty in caring for injured or sick people and the non-compliance of the USAF's stated policy that there would be "no flights over towns, residences or businesses".

4.2 Noise

Lack of correct USAF calculations of high noise levels on MTR's, especially on routes IR-178 and IR-102/141, is a result of "Models" that are not applicable to the low-level training flights proposed by the USAF. The basic data used to formulate these "Models" is not applicable to jet aircraft. Then, to compound the mistake, these "Models" are weighted averages based on the incorrect air speed. (See Note 6.0/#5 above)

4.3 Land Use

The basic approach to this category is this statement: "However, relative increases in noise and potential overflights experienced in portions of -- west Texas would appreciably alter the natural quiet for scattered rural residents." This is true at the present time. In the near future, it will be more so. (See Note 6.0/#5 above)

4.4 Air Quality

Lack of correct USAF calculations of higher aircraft operating speeds, relative to the use of factors reflecting actual flying conditions, has failed to show the actual extent of pollution along IR-178 and IR-102/141 in west Texas as well as the remainder of the routes and ranges. (See Note 6.0/#5 above) (See Note 6.0/#5 above)

4.5 Biological Resources

This USAF assessment is incorrect in all areas. The basic statements in all USAF EA's and EIS's assume there will be no long-range impact of plants or animals, whereas there are areas already impacted along IR-178 from the identical training flights that will take place on IR-102/141. (See Note 6.0/#5 above)

4.6 Archaeological, Cultural And Historical Resources

We have had no response in writing from the Texas Historical Commission. The Commission has, however, shown an interest in our investigation and complaint, as they have received no response to their request for information relative to these proposed additional flights.

4.7 Water Resources

We have no knowledge of any impact concerning the water resources in New Mexico. We have much knowledge of impacts concerning windmills and other water supplies in Texas. However, with so many deviations from acceptable standards of engineering and application thereof, we have become very suspicious.

4.8 Hazardous Materials and Waste Management

We are primarily concerned with the spilling of jet fuel and the known amounts of CO and NOx.

4.9 Socioeconomics

To our group, this section of the EIS is a total disaster. The complete USAF disassociation of the critical part of the Socioeconomics of the Trans-Pecos Area is unconscionable. Not enough can be said about such a major omission. (See Note 6.0/#5 above)

4.10 Transportation

We have no comment on this section as it does not effect the Trans-Pecos Area.

4.11 Utilities

We have no comment on this section as it does not effect the Trans-Pecos Area.

4.12 Soils

We have no comment on this section other than a concern with these jet fighter aircraft blowing dirt in our eyes and down our shirts.

4.13 Safety

We can acknowledge the fine technical work involved by highly skilled mechanics, electricians and electronic experts that make up the ground crews. Our main concern is the ever present "human error" and the natural law of chaos (Murphy's Law). This entire proposed training program of low-level training flights reminds us of a long ago conversation with then Colonel "Chuck" Yeager. He stated the average career percentage of mortality for fighter pilots in the USAF was 31.2%. These pilots are trainees. May God help them.

Respectfully,

Harold Bryan Kelley, CPCM

Business Economist

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Attachments To Be Mailed:

Newspaper Cartoon

EIS analysis

Separate Letter of Inquiry
News articles
Technical Information, USAF F-4 Fighter

Viewpoint

JUST ANOTHER HE CLINTON FEEL-GOOD GO PHOTO OP! THE NON-CHALANT PLACE IN HISTORY! SINC

WHERE WAS CLINTON ON AFFIRMATIVE ACTION?

TALK IS CHEAP, BUT! SHOW US THE MONEY.

EVER ASKED ANYBODY?

dear boss

You can say "kudos"; you can issue "accolades"; you can toss "bouquets"; you can "tip the old Sleisohn"; or you can reach out and grab a dozen other superlatives. They all will apply to Rhonda Cole and members of the Alpine Kiwanis Club for the huge mind of Sam Rich Sam-U-L. Except, dang it, specified number o both feet! Shades of change men! Take a look at

SAM-U-L

"Good day, sir. I'm Colonel Jones, United States Air Force. Here to see if you folks in the Big Bend would mind if we flew a few jets over your area."

"Not you again, Jones. Look, man, we told you last time you were here that we don't want a lot of jets thundering around — especially at low altitudes — disrupting our peace and tranquility, spooking the livestock and polluting the air. The answer is no. That's it. No...no, as in no!"

"I don't think I heard you clearly. Would you or wouldn't you mind if the Air Force flew training missions over the Big Bend?"

"Try to read my lips. NO...NO...NO. NO NOISE...NO!"

"In our last survey, we got the distinct impression there would be no significant impact if we flew over the area."

"That's because you weren't paying attention."

"I'm going to keep asking until we get to the bottom of this. Would it or would it not be OK if we flew at low levels over the Big Bend, and, in the future, would it be OK if the German Luftwaffe added a few flights, with say, 30 or 40 of their jets? Yes or no?"

"NO!"

"Well, if you can't make up your mind, I guess that means we can do whatever we want."

"Why are you wasting our time? Guilty conscience?"

"Well, individual flights are little annoying, we know, but the irritation only lasts a few seconds."

"Yeah, like having somebody fire off a gun next to your ear — only lasts a few seconds."

"Some livestock may be temporarily startled by overflights, but the effect would be minor and short term and would not result in changes in population or habitat use."

"Not unless I'm out working cows and one of your jets screams over right above my head and my 'ol pony spooks and bucks me off and tramples me to death. That would result in a decrease in the human population."

"Well there are five billion people on the planet. So we lose one. We don't call that significant impact. You've got to look at the big picture."

"You wouldn't make much of a philosopher, Colonel. The answer is still no."

"I don't think I heard that. Look, let's give this thing some time. We'll hold a few more town meetings and try to find out how the people really feel."

"I told you how we feel."

"But you're just one person, and only a few hundred have responded to our survey, and not that many people live around here anyway, and..."

"...yeah, I know — there are five billion people on the planet. No significant impact."

"Now you're talking. I'm glad we were able to help you get in touch with your true feelings. Besides, you know we'll do what we want anyway. Why fight it?"

"Sometimes democracy works in mysterious ways."

Sam Richardson/TERLINGUA

WEEKLY REPORT

Congressman
Henry Bonilla

23rd District, Texas

1017 Longwood House Office Building, Washington, D.C. 20515 (202) 225-5311

dear boss,

on the mouths of the young;
vation is a nation that can't
e it is its mind which way it
is go.

There are justifiable reasons for overtime, but careful scrutiny must be applied at all times or it will get out of hand, and I personally be-

PROPOSAL ON THE

THE BIG BEND *Sentinel*

קטן: 33 מ"מ

AUGUST 1, 1998

No flights, please

News notes

Alpine site of nuke dump meeting

those wishing to voice opposition to the nuclear-waste dump in Sierra Blanca, there are two additional public comment meetings now scheduled for September 11 in Alpine, on September 11, 11-13 p.m., and 6:30-9 p.m. in the Marshall Auditorium, Morelock Academic Building, at Sul Ross State University.

Students win

CHAMPION CONTEST — Maria High School student Jacob Lujan and Korean American exchange student Jojo Won Kim, who attended MHS during this past school year, were the winners of a Maria Chamber of Commerce contest to design new Maria Lights Festival T-shirts. Lujan's design appears on the fun run shirt and Kim's creation is on the festival T.

Each student won two tickets to the festival concert and a shirt with their design on it.

Pot was smuggled in 16 truck tires

loads of marijuana stashed in 16-liter of an 18-wheeler tractor-trailer rig at the Presidio port of entry Saturday.

The seized narcotic has an estimated street value of \$730,000.

Customs special agents had developed information that a 1987 ten-wheel commercial truck and a late-1980s 18-wheeler tractor-trailer could enter the port carrying drugs, and a vehicle matching that description arrived from Mexico.

Customs inspectors began searching the truck and noticed the driver, 27-year-old Saul Marin-Morales of Cuahuatmoc, Tlhuahuatl, Mexico, was acting

107th Bloys Campmeeting begins Tuesday

[illegible][illegible]

Dr. Bloy and the people conceived the idea of a big round-up of the people in the area. "We

Chemically-sensitive neighbors plagued by Blyss spraying
Pesticide compromise fails to materialize

By DAHLINE BEAL
 FORT DAVIS • Despite ongoing efforts to remove an aerially applied chemical from the area, the Blyss community has been plagued by the spraying of a pesticide called "Red" for several years. The spraying has caused health problems for many residents, including children, and has caused the death of several animals. The spraying has also caused the death of several birds and other wildlife. The spraying has also caused the death of several fish and other aquatic life. The spraying has also caused the death of several plants and other vegetation. The spraying has also caused the death of several insects and other animals. The spraying has also caused the death of several birds and other wildlife. The spraying has also caused the death of several fish and other aquatic life. The spraying has also caused the death of several plants and other vegetation. The spraying has also caused the death of several insects and other animals.

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**Robinson re
after stint w
Natural Hist**

BIG BEND NATION PARK - Carl Robinson has been named as executive director of the Big Bend National History Association, and Charles Pat Dugan has been hired as the association's new executive director.

The announcement was made by Rob Dunagan, chairman of the association's board of directors at a July 25 board meeting. A Marfa native and a retired Marfa Independent School District teacher, Dunagan said he

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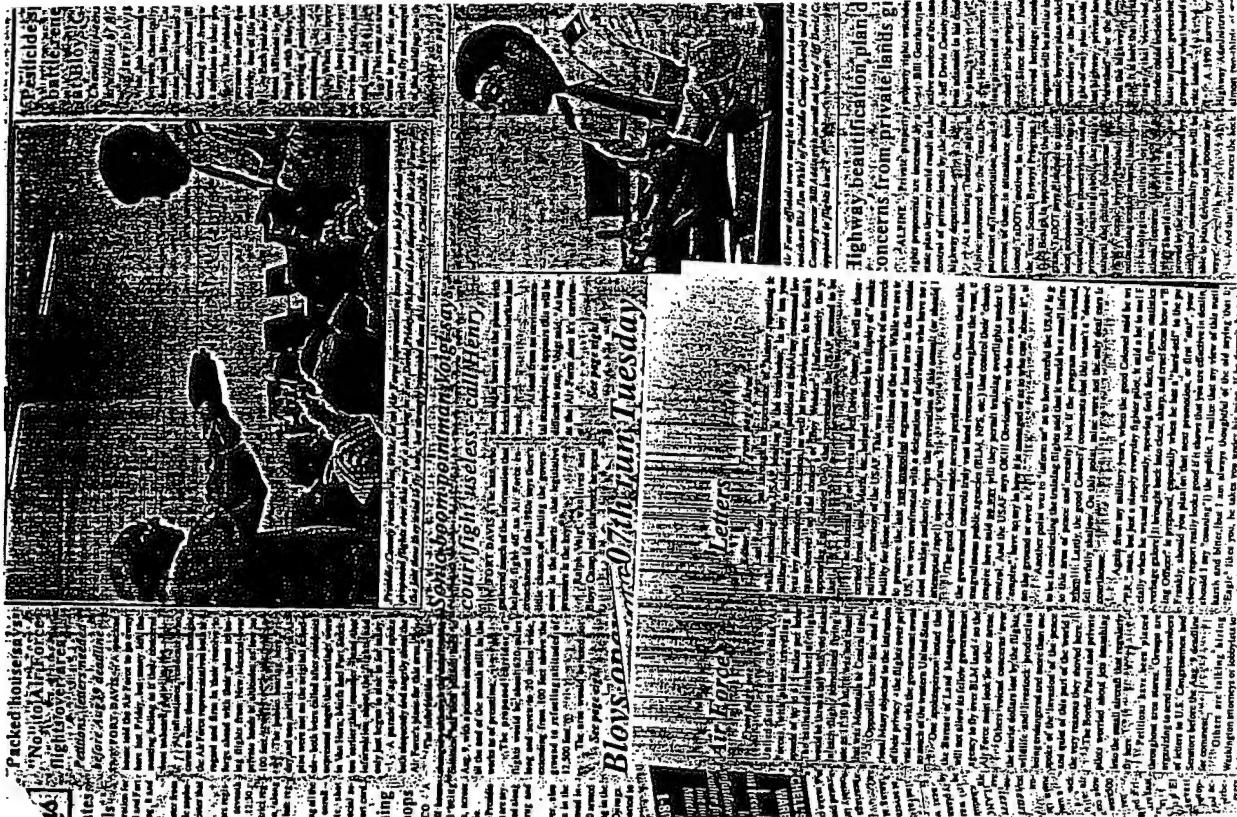
Nuke, die hearing in Sier

FAR WEST TEXAS • If

County Attorney Teresa T. ...
who has been active in pro- ...
the proposed nuclear-w ...
This Tuesday, citizens fr ...
over Far West Texas are in ...
gather in Sierra Blanca ...
and a preliminary public he ...
open to anyone - as part o ...
process of deciding whethe ...
proposed nuclear waste d ...
could be granted an open:

The hearing will be held in Barra Blanca in the high school gym and will be conducted by the State Office of Administrative Hearings (SOAH). --

Opposition groups will ho
stably at 6 p.m. in the park in f
f the high school followed f
arch at 7 p.m.



Packed house says "No" to Air Force
A packed house of 100 people in the Port Davis Junior High School on Friday night, Aug. 8, voted to oppose the proposed flight corridor over the town of Port Davis, Mont. The vote was 100 to 0.

Sparks boom in political activity
court fight useless - call Henry

Blows on Tuesday

Air Force

Jeff Davis County

Mountain Dispatch

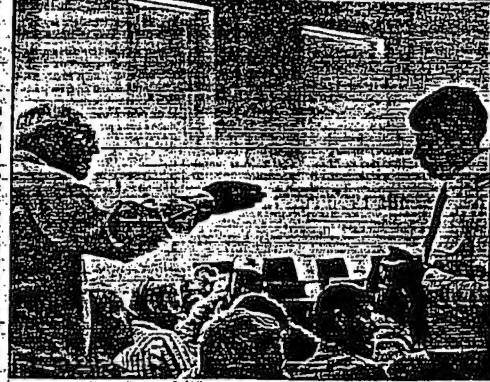
VOL. 11, NO. 31 Aug. 1, 1996



Packed house says "No" to Air Force flights over area

Registration dates given for schools
PORT DAVIS - Registration for Port Davis Junior High School and Port Davis High School will be Aug. 8 and 9, and then again on Aug. 12. Families and parents register from 9 a.m. to noon on Aug. 8, while sophomores and freshmen are to register that afternoon from 1:30 to 4 p.m. On Aug. 9 eighth graders register from 9 to 11 a.m., with seventh graders coming in from 11 to 12:30. Students new to the district register Aug. 12 from 9 to noon, along with new students needing to be registered. New students should bring all the necessary documentation to enroll: transcripts, birth certificate, school records, proof of residency, social security card and last year's report card.

Mexicans planning 600 Ojinaga troops
OJINAGA, MEXICO - A military invasion that will bring 600 Mexican soldiers to being planned in Ojinaga, Mexico, across the Rio Grande from Presidio, according to reports in Presidio and Chihuahua City, officials are saying the troops will be deployed along the river to help combat drug and weapons smuggling.



Sonic-boom pointman Koigt says court fight useless - call Henry
PORT DAVIS - The man who gathered much of the information that helped fight off an Air Force encroachment in the 1980s says there's little chance of beating the govern-

Pesticide battle rages at Bloys
Chemical actions of DDT
The battle has been between chemical and those who have been concerned about the effects of DDT on the environment. The battle has been fought in the courts and in the public arena. The battle has been fought in the courts and in the public arena. The battle has been fought in the courts and in the public arena.

July 30, 1997

Environmental Protection Agency
Region Six
1445 Ross Avenue
Dallas, Texas 75202

FAX (214) 665-7446

Attention: Mr. Mike Jansky

Reference: Investigation/Analysis Group, Trans-Pecos Area of Texas

Expansion of German Air Force Operations At
Holloman AFB, New Mexico; Draft, June, 1997, Environmental
Impact Statement

Proposed Airspace Modifications To Support Units At Holloman
Air Force Base, New Mexico; Draft, July 26, Final Environmental
Assessment, June 9, 1997

Dear Mr. Jansky,

Thank you for your, and Mr. Joe Swick's help in our efforts to furnish you
with information from our investigation and analysis of the referenced
Environmental Impact Statement and the Environmental Assessment.


First, there is a correction to be made concerning the USAF's training of
low-level refueling between two GAF fighter aircraft. We made an error in
stating this type training was not set forth in the EA, 1996/1997. It is
included on Page 2-6, para. 2.

Should we discover any additional errors in our investigation, we will
contact you immediately.

We are FAXing our members-only brief relative to legalities and ethics.
With this will be our Letter of Inquiry as part of our learning process. It
would help us to have a copy of the Environmental Assessment. May, 1993.

As we gather additional information, we will forward it on to you as long
as these EPA cases are active. We will label any further information as
addendum. There should be nothing more than duplications of what we
have already found to be pertinent.

Respectfully,


Harold Kelley, CCM
Government Contract Management
P.O. Box 605
Alpine, Texas 79831

(915) 364-2323

FAX 364-2299

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Legal And Ethical Brief No. 3036, August 1, 1997
Formal Complaint Against The Below Listed United States Air Force Proposals
To Whom It May Concern:

Subject: The Proposed Actions Of The United States Air Force, Air
Combat Command Relative To Low-Level Flights In The
Trans-Pecos Area Of Texas

Proposals By The United States Air Force Are:

- (1) Proposal For Modification Of Air Space For
Instrument Route IR-178, 1993
- (2) Proposed Airspace Modifications To Support Units
At Holloman Air Force Base, NM, 1996
- (3) Proposed Expansion Of German Air Force Operations
At Holloman AFB, New Mexico, 1997

Section I: Investigation by Analyzing and Investigating Group

Our investigation of the referenced documents, witnesses and de facto
occurrences shows a progression of deteriorating environmental conditions
of the Trans-Pecos Area (TPA) relative to the implementation of the initial
Environmental Assessment (EA) of 1993.

Projecting the compounding of the initial deteriorating source by imple-
mentation of the Environmental Assessment (EA) of 1996, through the Envi-
ronmental Impact Statement, Draft, July, 1997 we find an increasingly
deteriorating condition. The compounding of the volume of sorties along
these routes in the TPA is to compound the deterioration of the environment.

Projecting the documented intentions of the United States Air Force, Com-
bat Command, to the near future, accumulated evidence from the listed
sources indicates a definite intent to compound the volume of sorties neces-
sary to accomplish these training exercises. This compounding of training
flights will end only with the establishment of a world-wide training facility
dedicated to unknown years of activity and expansion. These actions will
create immeasurable deterioration of the ecology and the environment of the
TPA.

This Investigation and Analysis is based on the referenced documents,
documented statements, claims and assumptions made by the United States

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Air Force (USAF), Air Combat Command (ACC), contained in the above referenced proposals, and from personal, letter or telephone interviews with residents, guests, travelers, students, land owners and other citizens of the Trans-Pecos Area.

This group of citizens constitute a class action representation of citizens in the Trans-Pecos Area. (TPA) The TPA covers the area west of the Pecos River, south of the New Mexico/Texas border and north of the Rio Grande River (Rio Bravo).

As of this date, our Investigation and Analysis Group has not obtained a copy of the Environmental Assessment, 1993, document.

Our investigation is based on interviews with residents of Sierra Blanca, Alpine and Fort Davis, Texas, ranchers, campers, tourists and visitors who have witnessed USAF flights at low levels along Instrument Route (IR) 178 as shown on the El Paso Sectional Aeronautical Chart, 56th Edition, February 27, 1997, and generally from citizens from the TPA. Unrecorded interviews and conversations with witnesses are classified as "hearsay evidence", and may, or may not, be true and correct. Letters and taped conversations with witnesses shall be deemed to be true and correct. (The truth as they know it.) No sworn oaths have been taken.

In 1993, the USAF, ACC, proposed to modify airspace to support USAF units located at Holloman Air Force Base (AFB), New Mexico. The proposed action was for the purpose of training USAF and German Air Force (GAF) units in low-level stealth maneuvers. In May of 1993, this action was assessed in an Environmental Assessment (EA) and a Finding of No Significant Impact completed in 1993. We assume this was the EA that lowered the minimum above ground level (AGL) to 100 feet for Instrument Route (IR) 178 that is over Sierra Blanca and to the southeast. This training has been ongoing for some years.

In 1996, the USAF again proposed to modify airspace to support USAF and GAF units located at Holloman AFB, New Mexico. The proposed action was needed to meet expanded training requirements. Due to the progressive expansion of this training program, compensation was needed for increasingly limited access to White Sands Missile Range airspace. In May of 1996, 12 GAF Tornado aircraft were then stationed at Holloman AFB. As specific GAF Tornado mission-in-training plans were being prepared, they identified an additional requirement to perform long-range, low-level training flights (down to 100 feet AGL) as well as the need for low-altitude (down to 300 feet AGL) air-to-air combat training for both Tornado and F-4 aircrews training at Holloman AFB.

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The GAF also identified additional need for air-to-air refueling at altitudes lower than currently available in the vicinity of Holloman AFB. This low-level refueling training would be as low as 1,000 feet AGL, and would be between two PA-200, or two F-4, fighter aircraft.

As a result of the above stated changes in requirements for this type training, the USAF proposed to lower the 500 foot minimum to 100 feet AGL.

Ignored by the authors of both the related EA's and the FIS, were the factors of these new altitudes and speeds relative to the ground level impact. The impact of these new altitudes of 100/300 feet AGL, 736 MPH aircraft speeds and 60 to 95 MPH winds must be assessed. These de facto long term conditions create an ALIEN ENVIRONMENT that is terminal for life forms on earth.

The USAF's EA determined these proposed actions are not expected to result in significant impacts to the natural or human environment. No significant impact on civil aviation is anticipated. These claims are a complete contradiction to known facts.

We assume anyone in a position of authority/responsibility in the USAF has a reasonable education, and a corresponding amount of experience, to differentiate between jet aircraft that take off, land and park at Holloman AFB, New Mexico, and the low-level flights over private property and private citizens in the Trans-Pecos Area of Texas. Perhaps the lack of understanding comes from the fact these jet aircraft do not take off, land or park in Texas.

In lowering these Military Training Routes (MTR's) to 500 feet AGL minimum elevation, we claim the first mistake was made. This accommodation for the military was done at a time when the size and power of aircraft was increasing, along with the Noise and Pollution. Any changes made in the minimum elevation for these MTR's should have been higher.

To compound the mistake, the minimum elevation was next lowered to 100 feet AGL. The aircraft engines became larger and more powerful. All this power is, of course, translated into tons of jet fuel. The Noise and Pollution became progressively more damaging to the Environment, and hence to the Ecosystems.

None of the USAF's determinations of proposed actions have proven to be correct. For information concerning IR-178 over Sierra Blanca, write to or telephone Bill Addington, P.O. Box 216, Sierra Blanca, Texas, 79851, or call (915) 369-2541.

Section II: Analysis by Investigating and Analysis Group

These actions and these progressive proposals for expansion are a destructive and unreasonable intent. These are 45,000 to 60,000 pound air-

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craft flying at 500 to 621 miles per hour (MPH) 100 to 300 feet AGL. This series of events creates a unique physical reaction of explosive sound and air movement that humans, animals and plant life are not naturally exposed to. This transformation of energy is a law of physics. It's a destructive force, both physically and mentally.

There is a tremendous amount of energy generated by the burning of jet fuel through one or more engines; generating 30,000 pounds thrust, converting this energy to a motion of mass, heat, noise, wind and polluting gasses and unburned jet fuel.

What has been created is a completely ALIEN ENVIRONMENT.

All this action is taking place 100 to 300 feet (or lower) AGL. In this 300 feet of space are life forms. There are birds in the air, plants and animals on the surface of the ground, and micro-environments under the surface. These life forms constitute ECOSYSTEMS.

None of these ECOSYSTEMS are compatible with this ALIEN ENVIRONMENT. These ecosystems contain HUMANS. Our investigation explains where this ALIEN ENVIRONMENT originated, and our analysis explains how it is created.

The originators of this series of unreasonable acts, known as facilities for a training program, have obviously never been at the ground level position of these equations in physics with a piece of machinery of this size, sound and velocity flying over their heads. Our analysis shows these ecosystems will be severely damaged, will either mutate or die in this ALIEN ENVIRONMENT.

Section III Results of Investigation and Analysis; History

(1) The necessary components for this training, as we understand it, are: jet fighter/bomber aircraft that can perform the maneuvers necessary to fly over rough mountain terrain at a speed close to sonic, be able to maneuver down canyons, through small "cuts & saddles" and between hills, all to avoid Electronic or visual detection. Flying at the correct speed means "not being heard until the aircraft has passed any anti-aircraft guns or troops". Low to the ground helps block laser or radar detection by being in a canyon, valley or between two hills. Ask the home and business owners in Sunny Glen subdivision on the west side of Alpine, Texas about this.

(2) We now have the correct aircraft and the correct technology for the aircraft. Now, all we need is the correct geographical location. In the Environmental Impact Statement proposing the addition of 30 additional GAF fighters, there is a statement that relates to the geological and geographical structures desired: high, semi-arid mountains, fair weather, not too hot and not too cold and sparsely populated.

Prior to the initiation of this training program into the TPA, the natural conditions of the area were as follows:

(1) There is a growing population of several thousand humans living in the area. Some are permanent residents, some are visitors, some come for business reasons, some are passing through.

(2) We have a clean, healthy environment. It is also quiet.

(3) We have long views and majestic scenery, unlike Pennsylvania, New York or California. In photographs of these places, you do not hear the noise or smell the pollution.

(4) The Trans-Pecos Area of Texas is a vast expanse of open country relative to Pennsylvania, New York or California. So is New Mexico, Montana and other states and areas of the United States (US). At this time, there are thousands of people in this area. Our economy is small because we have few factories, shipping, financial centers or silicon valleys. This remote area is clean, and the people here are honest.

Section IV: Technical Analysis

The following are major parts of this complaint. We have used the available technical information published by the USAF in the 1993 EA, the 1996 EA and the 1997 EIS, to formulate the above and following opinions.

To qualify the proposals for this new training center, the USAF used the available environmental studies from the two EA's of 1993 and 1996, and the EIS of 1997, and applied them to an incorrect activity and place.

(1) All data concerning noise and pollution are predicated on Airports, Airfields and Air Bases. The average population is not exposed to this type of noise or pollution. At any commercial Airport, we drive to it in our car, taxi cab, bus line or such. You may, or may not, hear large airliners taking off or landing. They are high above you, or take off going away from you, and aircraft noise you hear grows progressively louder, passes over and grows progressively quieter.

In the sound-proof Air Terminal, we hear no roar of jet engines. After boarding our flight, we are towed away from the gate, and turned in the correct direction. Or, if we load onto our flight up some stairs, we may hear one jet engine that is difficult to talk over. Once seated, doors closed, we hear and feel the jet engines increase power, and we start our taxiing run.

Within the Airliner, we can talk with no difficulty, may read, or gaze out the window. We get to the end of the runway, the pilot gives full throttle to the engines, and we start our take-off. The noise increases considerably, we smell nothing, we can still carry on a conversation and feel only a slight vi-

bration of the jet engines. There is still no adverse feelings, sounds, odors or sights.

(2) But, stop the story here and THINK for a moment. The ground crew, on start up of the jet engines, were all wearing respirators, ear plugs, ear muffs, long sleeved jump-suits, gloves and caps. They were on the other side of the wall that screened us from the extreme noise and pollution.

(3) In the Trans-Pecos Area, we have been forced, against our will and better judgement, to the wrong side of the wall. Have you ever seen motion pictures of what a Navy Aircraft Carrier is like when launching aircraft? There are Video Tapes of the sights and sounds, but not the odor, of Aircraft Carrier Operations. When a USAF jet aircraft flies over us at 552/621 MPH, 100 feet AGL with no warning, it's worse than being a member of the flight crew on an Aircraft Carrier as we have no special suit, no gloves, no ear plugs, no ear muffs and no respirator.

The situation can be simply explained: We are on the wrong side of the wall.

(1) Airspace Use And Management.

Lack of correct management by the authorities at Holloman AFB is demonstrated in the conduct of the pilots in training. There are numerous documented accounts of accidents caused by these low-level flights, loss of sleep, difficulty in caring for injured or sick people and the non-compliance of the USAF's stated policy that there would be "no flights over towns, residences or businesses". We are frequently used for "target practice" or markers for reference.

There is little possibility any of the citizens (victims) affected by these flights will be wearing, or have access to, protective devices equal to the pilots and ground crews of these aircraft.

(2) Noise.

Lack of correct USAF calculations of high noise levels on MTR's, especially on routes IR-176, IR-102/141 and IR-122/130, are a result of "Models" that are not applicable to the low-level training flights proposed by the USAF. To compound the mistake, these "Models" are weighted averages based on the incorrect air speeds and time frames.

There is a lack of relativity to the true and correct conditions relative to these low-level flights as they impact the people, animals and plants on the ground. This lack of understanding is clearly shown in the USAF's Figure 4.1-2, Page 4-7, Noise Exposure From A Single Overflight Of A PA-200 at 100 feet AGL. Compare this with the true and correct Noise Exposure showing the actual explosive noise existing, in conjunction with the gale force blast of

air in Figure 4.1-2, Page 4.7 as modified by the Investigation and Analysis Group.

The "Models" script and references to noise in this section, Page 4-5 through Page 4-7 and Appendix "C" do not relate to the noise factors, circumstances or scenarios created by flying MTR's at 100 feet AGL at speeds up to 621 MPH. In USAF Figure 4.1-2, Noise Exposure, note the values used in creating this Figure 4.1-2. There is the Model of the Aircraft, a time frame, a decibel quantity, but no speed factor.

Figure 4.1-2 also shows the standard limit of 125 decibels of noise allowed by the governing authorities who are the Department of Defense (War Department) and the Federal Aeronautics Administration.

In the Figure 4.1-2 created by the Analyzing Group, we have interpolated a speed factor of 736 MPH to a decibel quantity of 142 decibels. This speed of 736 MPH is approximately the speed of sound at an altitude of 5,400 feet Mean Sea Level (MSL). In Figure 4.1-2, the USAF uses a lower aircraft speed in order to meet the lower sound limit of 125 decibels. This variance in speed factors will effect the amount of noise. The lower the speed, the lower the noise.

See USAF Figure 4.1-2, Page 4-7, AS, 1996 and Analysis Group Modified Figure 4.1-2. Comparison will provide a reasonable picture of the true impact of these unannounced training flights.

(3) Land Use.

The basic approach to this category is this statement by the USAF: "However, relative increases in noise and potential overflights experienced in portions of west Texas would appreciably alter the natural quiet for scattered rural residents". This is true at the present time. In the near future, it will be more so.

The USAF has ignored the de facto use of the 10,000 plus square miles of private property to be used in these training exercises. There are court decisions in the past that have determined what constitutes trespass on private property from the air space above.

(4) Air Quality.

The lack of true and correct USAF calculations based on higher-than-published aircraft operating speeds and actual flying conditions has failed to show the true and correct extent of pollution along IR-176, IR-102/141 and IR-122/130, in west Texas as well as the remainder of the routes and ranges. The USAF does not publish in the EA, 1996 or the EIS, 1997, data that is possible to check. To avoid redundancy, relate the basic methodology used by the USAF in Section 4.2, Noise, to this exercise in claims concerning

Air Quality. The Charts, Figures, script and other engineering resolution do not apply to the low-level training flights over the MTR's in the TPA of Texas. In some instances, they do not apply to Holloman AFB operations.

(5) Biological Resources:

The basic statements in both USAF EA's and the EIS assume there will be no long-range impact on plants or animals, whereas there are areas now being impacted along IR-178, from the identical training flights that will take place on IR-102/141 and IR-122/130.

An unnatural, chronic disturbance of any wild animal is cause for it to leave the area. This action will partly depend on the availability of the proper food, ample clean water and shelter. There will definitely be a migration of mobile animals from under these MTR's. If they could, all domestic livestock would also leave, but they are generally fenced in.

Occasionally, they will not leave an area for any reason. The variables have to do, of course, with survival. In high and normal rainfall years, game herds will scatter. In normal and low rainfall years, they wouldn't leave unless very stressed. All animals respond to alien occurrences in different ways.

Hunting leases constitute a large proportion of income in today's Trans-Pecos Economic Environment. Some ranching operations could not exist without them. We have information relative to the years of low-altitude flights along IR-178 concerning the constructive, or destructive, impact, on Biological Resources. Contrary to the USAF's opinion, all biological life forms are damaged by these low-level flights. Jet fighters flying at 100 feet, or 300, or 500 feet is just too low for natural life forms to tolerate.

IR-102/141 passes over a herd of Elk located just west of the town of Marathon, Texas, south of the Glass Mountains. Low-level flights over the wide valley and mountains they range in will be damaging to this Elk herd program.

(6) Archaeological, Cultural And Historical Resources

We have had no response in writing from the Texas Historical Commission. The Commission has, however, shown an interest in our investigation and complaint, as they have received no response from the USAF to their request for information relative to these proposed additional flights.

(7) Water Resources

We have no knowledge of any impact concerning the water resources in New Mexico. We do have knowledge of impacts concerning windmills and

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other water supplies in Texas. We have eyewitness accounts of windmill fans torn up by the high winds of jet aircraft deliberately flying as close as possible to them.

(8) Hazardous Materials and Waste Management

We are primarily concerned with the spilling of jet fuel and the known amounts of CO, NOx and Particulates.

(9) Socioeconomics:

There is no Social/Economic assessment made in any of these EA's or the EIS, concerning the Social/Economic Structure of the Trans-Pecos Area. The USAF consistently ignores the social structure, minority races and the economic status of the majority of the citizens of this area, in direct contradiction to

(1) Presidential Executive Order #12896, Environmental Justice, page 3-121, para. 3.9.8 and Figure 3.9-1, page 3-122

(2) The fragile economic balance between an expanding economy versus a subsistence, or decreasing economy.

The economy of any Trade Area depends on the ratios of "new money" to subsistence income. At the present time, the Trans-Pecos Area is primarily an agricultural community, but with several incentive programs managed by a combination of the Texas Commerce Department, private donations in the Trans-Pecos Area and a newly established local organizations, we now have a growing trade area. This USAF training program is directly counter-productive to all our efforts. Detailed information of our accomplishments is available on request.

In order of cash-flow volume of "new money" into this Trade Area, the following are the known sources:

- A. Cattle, sheep, goat ranching, hunting/camping leases
- B. Sul Ross University, Texas University System
- C. Retirement population/new construction
- D. Welfare recipients
- E. Tourist Visitors
- F. Southern Pacific Railroad Employees
- G. State and Federal Employees
- H. Motion Picture Industry

The retirement and tourist economics have been on the rise the past 5 years. The motion picture industry has been steady for 8 years, and has

gained slightly in the past five years. For a while, there was a decrease in these three "new money" sources. It could have been the national economy, or it could have been the drought. We doubt it was related to USAF actions along the MTR's in the area. That will come later. The citizens of Alpine, one of the larger towns in the Trans-Pecos Area, (population 5,460) have just begun to be exposed to the low-level fly-overs. The citizens living in towns have yet to grasp the concept of the eventualities, with the exception of Sierra Blanca, Texas. Since 1962, there has been an equal growth of population in the outlying county areas, relative to growth of the town populations.

In Alpine, three motels have been built in the past three years. When interviewed, the managers informed us their studies indicated there would be an increase in occupancy from three sources: (1) The increase in enrollment at Sul Ross University brings more friend and family related visitors, and (2) the vacation overnight facilities at Big Bend National Park would not be expanded due to cuts in budget by the National Park Service (NPS), and the controversy over NPS service contractors, (3) There are more day hikers and day campers in the surrounding country side.

The ratio of "destination" vacationers to "transient" vacationers becomes closer each year since 1966.

Outside the towns, in the counties, private land owners are planning additional business enterprises. As an example, there is 7 1/2 more new construction in the county areas than in Alpine, Texas. Cattle, sheep, goat ranching, hunting/camping leases business enterprises have plans (heavily evidence) to provide destination facilities for camping vacationers.

These camp grounds will be constructed in very beautiful, high altitude country. Initial plans are for a number of well-arranged campsites with electricity, potable water, rest rooms, showers and access to hiking and helping ranchers with their goat, cattle and horse operations (Dude Ranching). All this at a cool summer altitude of 4,400 to 6,400 feet AMSL. These are mostly small camp grounds for families.

There are also plans for apartment and office buildings in scattered, rural locations, but none will start construction until this low-level flying is stopped.

The present impact of low-level training flights by the USAF has been noticed by various tourists, hunters, campers and mostly by the private businesses related to outdoor activities as well as the ranching businesses and the ranch employees.

There is another tier of SocioEconomic Impact. With the progressive expansion of these sorties up to approximately 22,252 per year, 69 per day, the danger of highway accidents will increase, as will accidents to ranchers, ranch employees, hunters, hikers, campers and eventually to residents of the towns in the area.

(10) Transportation:

We have no comment on this section as it does not effect the Trans-Pecos Area.

(11) Utilities:

We have no comment on this section as it does not effect the Trans-Pecos Area.

(12) Soils:

We have no comment on this section other than a concern with these jet fighter aircraft blowing dirt in our eyes and down our shirts.

(13) Safety:

We can acknowledge the fine technical work involved by highly skilled mechanics, electricians and electronic experts that make up the ground crews of the USAF and GAF at Holloman. Our main concern is the ever present "human error" and the natural law of chaos. (See Murphy's Law). This entire proposed training program of low-level training flights reminds us of a long ago conversation with then Colonel "Chuck" Yeager. He stated the average career percentage of mortality for fighter pilots in the USAF was 31.2%. The USAF pilots in these proposals are trainees. May God help them.

Until a year ago, the safety factors and documented accidents related to the citizens of the TPA show a small incidence of injury or death due to these low-level flights. Based on the past actions of the USAF fighter pilots, with the increased low-level training flights, there will be an upward progression of aircraft-related accidents among the citizens on the ground and in private aircraft.

Our access to competent emergency treatment is Odessa, Texas, 3 hours and 15 minutes away. We have an emergency facility in Alpine, Texas, 20 minutes to 1 hour and 45 minutes away, that is staffed by technicians and nurses.

There are numerous accounts of citizens who have had frightening experiences with low-flying jet aircraft flying under 100 AGL. Incidences of flying at vehicles head-on over a high-speed highway, timing the vehicle to pass just in front of it at 50 feet AGL; chasing a motorcyclist on the highway and three jets playing with a vehicle on the highway to see who could get the closest have been reported to us. These MTR's cross state and federal highways thirteen times in the Trans-Pecos Area.

People have also been blown off ladders, blown off their feet and startled enough to drop objects and horses startled enough to throw their riders.

Cumulative Impacts:

- (1) It is imperative for the EPA to conduct tests and experiments to determine what the true and correct impact of these low-level flights will have on all phases of the environment. At this time, we can discover NO BENEFITS from such UNREASONABLE ACTS, but find numerous destructive acts.
- (2) It is possible for us to extract true and correct data from standard engineering books available in our libraries to contradict the USAF claims. We can only assume the calculations are mathematically correct. The base factors are what are not reasonable.

However, we have determined there is a direct responsibility for the USAF to include this information in its EA's and EIS's submitted to the EPA for review, and we should abstain from interfering with this process.

If necessary, we will publish engineering data from independent, public sources. These data show unreasonable differences in most of the USAF's claims and our claims. It is our opinion, based on the engineering data used to arrive at the published Airspace Use & Management, Noise, Air Quality, Safety and Socioeconomics, that none of these subjects have been correctly addressed by the USAF. There is no assessment of the Social/Economics of the TPA per say.

- (3) There is a progression to this series of USAF proposals that has as yet to reach its ultimate goal. The USAF has provided us with extensive information concerning the future of these training programs set out by the two EA's and the EIS.

The USAF started with a few fighter aircraft for special units (Wings) to become proficient in the type air warfare proposed to be taught with these programs based at Holloman AFB. There were objections exactly like ours to this training taking place at scattered USAF bases across the USA. There were efforts to do this type training in England and Germany, to no avail. The training programs were ejected from those countries.

The final progression, according to information received from the USAF, is to establish, maintain and operate a world class training facility for this low-altitude combat training to be shared, for a price, by all USA military air power, all North Atlantic Treaty Organizations and all other nations that choose to purchase our military aircraft, old or new.

The possibilities for destruction of the TPA ecology and environment are endless. There will be additional Military Training Routes (MTR's) established; then there will be a need for super-sonic training flights.

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The pity of it all is the total lack of necessity for any of this. There is no logical explanation for this need. The USA is not at war. There is no national emergency. The only foreseeable wars are those the USA will initiate.

Harold Bryan Kelley, CPCMA
Government Contract Law
P.O. Box 605

(915) 364-2323

Alpine, Texas 79831

FAX (915) 364-2399

Attachments:

Figure 4.1-2, page 4-7

Figure 4.1-2, page 4-7 amended

Figure A-1, page A-4

Consumer Reports, August, 1997

"Clearing The Air"

Except from "The Human Zoo"

Dr. Desmond Morris, Zoologist

Letter of Inquiry

Profits In War, Bob Czeschin

Up-Graded German F-4 ICE Phantom

Newspaper Articles

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

July 30, 1997

Sheryl K. Parker
HQ ACC/CEVA
Air Combat Command
EIS Project Officer
129 Andrews Street
Suite 102
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

Enclosed for your consideration are two citizen letters we received from Harold Kelley and Anthony Sforza, M.D. both of Alpine, Texas, transmitting comments as result of their review of a Finding of No Significant Impact (FONSI) on the Environment and a current Draft Environmental Impact Statement (EIS) evaluating potential impacts of the German Air Force (GAF) Replacement Training Unit and associated air space modifications for Holloman Air Force Base (AFB), New Mexico.

We recognize that the public review and comment period for the FONSI expired in July of 1996. However, we ask that the comments in the citizen letters regarding the GAF activity be considered as part of the current 45 day public comment period for the Draft EIS. Comments received during this period should be responded to and addressed in the Final EIS.

We appreciate your assistance on this matter. If you have any questions, please call me at 214-665-7451.

Sincerely yours,

Michael P. Jansky
Michael P. Jansky, P.E.
Regional Environmental Review
Coordinator

Enclosures

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Enclosure (2)

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P.02

July 24, 1997

Environmental Protection Agency
Region Six
1445 Ross Street
Dallas, Texas 75202

Subject : Proposed Expansion Of German Air Force Operations At Holloman
AFB, New Mexico

Draft, June, 1997, Environment Impact Statement

Attention: Mr Mike Jansky

Dear Sir,

As per instructions by Mr. Joe Swick, we have faxed to your attention a complaint concerning the referenced subject. We will telephone your office to verify, or you may fax your verification to (915) 364-2299.

We wish to thank you, Mr. Swick and all others in your organization for your interest and assistance in preparing this complaint.

Harold Kelley
Harold Kelley

P.O. Box 605
Alpine, Texas 79831

(915) 364-2323

FAX (915) 364-2299

July 25, 1997

Environmental Protection Agency
Region Six
1445 Ross Street
Dallas Texas 75202

Proposed Expansion Of German Air Force Operations

At Holloman AFB, New Mexico

Draft, June, 1997, Environmental Impact Statement

Attention: Mr Robert Lawrence, Mr. Joe Swick and Mr. Mike Jansky

Dear Sir,

Please accept this as my complaint against the Proposed Expansion of German Air Force Operations At Holloman Air Force Base near Alamogordo, New Mexico.

Find below a summary of our analysis of this Environmental Impact Statement (EIS) done by the United States Air Force (USAF) for the referenced project. We have analyzed the June, 1997 EIS and have constructed a cross analysis of an Environmental Assessment document titled "Proposed Airspace Modifications To Support Units At Holloman Air Force Base, New Mexico, 1996/1997" in order to show a Progressive Relationship between the EIS and the EA. We have investigated an EA, 1993(?) for de facto lowering of IR-178 on the El Paso Sectional Aeronautical Chart. We need a copy of this 1993 EA. We think this 1993 EA lowered the altitude of IR-178. Is it possible for the Environmental Protection Agency to furnish us with a copy?

With the compounding of our discovery and the proposed expansion of Instrument Routes and Visual Routes, we feel it is time to initiate a complaint with the Environmental Protection Agency (EPA).

We are concerned about several claims and omissions made by the USAF that are not reasonable. Our group includes an Aeronautical Engineer, a Medical Doctor, an Economist, a Psychologist, an Animal Scientist and a Law Firm. We all have extensive formal education and experience in our respective fields. We consider ourselves to be reasonably competent in making an analysis of the EA and the EIS.

Please advise if there are any administrative steps we have not followed in order to implement a viable complaint concerning the lack of a complete and reasonable study of these proposed acts by the USAF in the Trans-Pecos Area (West of the Pecos river from the New Mexico border to the Rio

Grande). We would like to thank Mr. Joe Swick for his assistance, and for any assistance his associates may have contributed.

This EIS for "Proposed Expansion Of German Air Force Operations At Holloman AFB, New Mexico", is the next step in compounding what we consider to be a gross error. The error is in using six or seven Instrument Routes (IR's) and Visual Routes (VR's) in this area for any low-level training flights, much less additional low-level flights. We also have determined that the entire process of Notice of Proposed Action, Public Hearings and comments has been conducted in an unfair way to the public.

Analysis of referenced proposed action by the United States Air Force (USAF)

We have obtained USAF documents of this EIS and will follow them by using the Table of Contents as shown on page "iii". We will reference this EIS by page, paragraph and line number. Any claims or statements made in this analysis that are not in writing will be identified by the words, "Hear-say evidence". These claims and statements are verbal, and will be supported by witnesses.

Complaint that USAF Public Hearings and the resultant actions are unfair.

We consider the presentation of this EIS as UNFAIR due to the lack of documentation, communication or verbal instruction as to the procedures required, and to the misleading content of the titles used for these proposals. For all practical purposes, there was no public notice issued to the citizens of the Trans-Pecos Area. Ordinary citizens not intimately acquainted with such proceedings do not know who to or where to turn for counsel. The very wording of the titles is misleading. Reading this "Proposed Airspace Modifications To Support Units At Holloman Air Force Base, New Mexico" in a newspaper would not be of interest to a resident of Alpine, Texas, some 250 miles to the east. This action is going to take place in New Mexico. Only one out of 500 people even know where in New Mexico the Holloman Air Force Base is.

And, if you read the newspaper and saw "Proposed Expansion Of German Air Force Operations At Holloman Air Force Base, New Mexico", this, too, would not be of much interest to a resident in Marathon, Texas. Only those who were not confused by the carefully constructed titles of such a devastating announcement would show up at the Public Hearings, and they did. The majority of citizens in the Trans-Pecos Area of Texas did not attend. At this late date there is finally a feeling that perhaps the USAF cannot be trusted.

The end results will be as it was on the Environmental Assessments of 1993 and 1996/1997. No one will represent the citizens of the Trans-Pecos Area of Texas.

Our records show that, to our knowledge, of the fifty-two persons attending the Public Hearing on June 24, 1997, as of July 24th, the only response to telephone calls to the USAF is, "We'll look into it". No return calls have been received that we know of. At the July 7, 1997 Public Hearing on this EIS, a court reporter recorded everyone's words. A large number of people filled out a USAF form to receive a transcript of this recording. No one has yet received it, and time is of the essence. The lack of this information is one of the reasons this analysis has been delayed.

The USAF personnel performed to the requirements of the governing statutes, but did not advise how to contest these proposals, nor should they be required to. There is no doubt that should there be another "Gulf Oil War", or other military confrontation, the desired training of the USAF personnel in the area of low-level combat flying is essential. However, where may the public turn to for information and assistance in making a reasonable decision?

Our investigation shows that the citizens in the Trans-Pecos Area of Texas are very patriotic (or were). Comments and attitudes at the Public Hearings of 1993, June, 1996, June, 1997 and July, 1997, have shown a progressive deterioration of USAF credibility. No matter what the comments at public hearings were, the USAF gave no consideration to them. In the EA of 1996/1997 for "Proposed Airspace Modifications To Support Units At Holloman AFB", only two changes were made that we can find. Neither related to comments by the public. Our investigation shows 92% of the public hearing attendees were against all three of these proposals. Due to the shoddy performance of USAF administration, none of these comments were addressed. 74% are prepared to present witnesses and newspaper articles.

We see no evidence that the hearings, telephone calls or correspondence relative to this 1997 proposal will be any different.

4.0 ENVIRONMENTAL IMPACTS, Page 4-1

4.1 AIRSPACE USE AND MANAGEMENT, Pg. 4-1

4.1.1 Proposed Action, Pg. 4-2

In the past, in the present and probably in the future, Airspace Use and Management has been and will be the weak part of these training programs. We in the Trans-Pecos Area have no knowledge of the management at Holloman AFB, the gunnery ranges or other low-altitude flight IR's and VR's.

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The management we see is based on the very old Army premises of "I does what I likes and I suits me. Completing the mission is everything." Fighter pilots are by nature experimental and aggressive. They must be thus. We except this, but not the non-recourse irresponsibility of windmills torn up, gates blown down, livestock stampeded, wild animals injured or killed, roofs blown off, vent stacks demolished and people knocked down. All this by the combination of sound and wind energy. There is no recourse to correct these actions other than the USAF's "We'll look into it".

Then, we have a statement in the last paragraph (para.), page 4-3 concerning Refueling Routes. This has training for the PA-200 GAF fighter pilots refueling at 19,000 and 18,000 feet at Mean Sea Level (MSL), then in the first para. on page 4-4, we move to 12,000 and 18,000 feet MSL, then we have the PA-200 GAF fighter refueling at 1,000 feet AGL. On page 2-12 we have the first mention of the PA-200 fighter refueling at 1,000 feet AGL, and the first mention of the PA-200 fighter refueling another PA-200 fighter at 1,000 feet AGL.

In the EA of 1996/1997, there is no mention of the 1,000 foot refueling altitudes. These variations are also found within each proposal. It makes us wonder what the USAF is really going to do. We have discussed the 1,000 feet refueling exercise elsewhere in this analysis. Poor management

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4.1.2 No-Action Alternative, Pg. 4-5

No Action on implementation of this proposal recommended

4.1.3 Cumulative Impacts, Pg. 4-5

There are dozens of documented accounts of damage to livestock, windmills, buildings, wild animals and people. Other than animals and birds, no human deaths have yet occurred. Some years ago, the USAF paid for the destruction of windmills, but not lately. It is best that the USAF fly at least 1,000 feet AGL over private property, homes, businesses or public highways. The destruction by sound energy and gale force winds, the automobiles run off highways and the sleepless nights, are numerous enough to cause chronic, artificial, extreme mental tension. There seems to be no recourse for individuals

4.2 NOISE, Pg. 4-5

4.2.1 Proposed Action, Pg. 4-13

This part of the EIS draws the most attention from the USAF and the public. The USAF is in a noisy business. The modern jet aircraft generates a tremendous amount of noise energy. To help negate the effects of Surface-

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to-Air Missiles, it is necessary to fly these routes at, or near, the speed of sound at very low altitudes.

The three experiences I personally had, went something like this. (1) In April of 1996 at about 1:30 pm while working on a flat-bed trailer at the barn, there occurred a sudden explosion, then a roar that diminished and became a fast moving jet aircraft. There was no warning. The noise made my ears ring, the gale force winds made me stagger, and I had dirt in my eyes. Fortunately, the barn broke up some of the noise energy and the wind. (2) In May of 1996, at about 4:30 pm, while working in the open on some water well controls, there was a slight buzzing sound for a split second, then another explosion of sound and air. There was no warning as this jet aircraft came directly over me. The combined energy and gale force winds knocked me off my feet, blew dust, twigs and grass in eyes and nose, down my shirt and stung my face. Then the roar diminished as the jet fighter flew off. I picked myself up and pulled the thorns from my left hand. Then I got curious about the source and purpose of these jet aircraft.

The third incident occurred three days later while I was walking toward the job-site to take measurements. This time, there was a split-second roar to a crescendo, a blast of sound, but no wind. This was a USAF jet fighter aircraft that passed about 250 feet to the east of me, close enough to the ground to stir up dust, whip the tops of juniper brush around, and then drop down out of sight through a cut in the hills into the lower elevations of the Alpine, Texas area. My property is 5,400 feet elevation MSL.

One of the plus factors of an air-to-ground attack aircraft is their ability to surprise the enemy target by flying supersonic, or almost so, at low altitudes. This is an asset in a war zone. As we use to say during my nine years and two wars in the U.S. Army, "A War Zone is a nice place to visit, but who wants to live there?" There are dozens of similar documented accounts the same as mine.

On page 4-7, Table 4.2-1, we have the same non-applicable information put forth in the EA of 1996/1997, and probably in the EA of 1993. All the engineering information on sound in this EIS has no relation to the flights over IR-102/144 or IR-176. Our aeronautical engineer has made a careful study of this section on Sound and has determined it is not applicable to this assessment of IR-102/141, or IR-176. All this data is based on sound (noise) relative to an air field. In this instance, a USAF air field.

The formula for the A-weighted sound level is not applicable to the sound level of a 45,000 to 60,000 pound aircraft traveling at 515 to 552 miles per hour (just below supersonic speed) at 100/300 AGL. The sound level does not increase to a peak and then diminish. This means there is no warning of an increase in sound. As mentioned above, this is one factor (surprise) that will make this ground support aircraft effective. There is a sudden explosion, then a decrease in the sound. There is even a technical term used

In this assessment of sound that would ask us to believe we should take this 130 decibels (if that figure is true and correct) generated by an F-4 jet aircraft and spread it over a thirty day period. The technical term is "Onset Rate Adjusted Day-Night Average Sound Level".

The equally important engineering factor left out of this EIS, the EA of 1996/1997 and probably the EA of 1993, is the wind velocity generated by this 60,000 pound mass traveling at 552 MPH. The sound will make your ears ring (indicating physical damage), and may rattle the dishes off the shelf, but after the noise starts you, the wind velocity is what knocks you down, causes cuts and bruises, causes bone-breaking falls, and can blind you or even cause death under some circumstances. At 60 to 70 MPH on the open highway, it can throw your vehicle out of control, causing one-car or motorcycle accidents. Yet, the gale force wind is, to our knowledge, not addressed anywhere in the progression of EA's and EIS's.

4.2.2 No-Action Alternative, Pg. 4-21

No Action to be taken on this proposal

4.2.3 Cumulative Impacts, Pg. 4-28

There is a reasonable explanation for so many non-applicable engineering exercises. They apply to a known environment, an airfield, or gunnery range. Not to 100/300 feet AGL flights. No matter how you make the myriads of adjustments using a wide, non-related variety of formula and charts, the facts are that a mass of 60,000 pounds of stream-lined mass, traveling at 552 MPH at 100 feet AGL, creates a unique physical reaction of explosive sound and air movement that human and animals are not exposed to. It's a law of physics. It's a destructive force.

There is no known study in any of these official documents concerning the Environmental Impact of aircraft (one or more) flying at such unprecedented low altitudes. Unlike Air Quality, Socioeconomics, Biological Resources, and most other Sections of this EIS, this issue has not been addressed by the USAF relative to the MTR's. All information in this EIS, 1997, relates to airfields and other prominent aircraft zones of operation. The fact is, not one of the states in the United States, not one of the NATO nations, wants this program. That should tell our government something.

4.3 LAND USE Pg. 4-33

4.3.1 Proposed Action, Pg. 4-33

On page 4-45, last para., the USAF states, in a mixed up way, "However, relative increases in noise and potential overflights experienced in portions of - - - west Texas would appreciably alter the natural quiet for scattered rural residents." This has already been addressed in our analysis. The fact is, the increases in noise from present overflights has already damaged the lives of hundreds of people in the Trans-Pecos Area, and can only get worse. On page 4-46, the USAF blandly states in para. 1 that things will get louder and windier; in para. 2 the repulsive conditions will expand; in para. 3 and 4 they continue with the bland statement that the noise will be irritating and eventually damaging.

The most prominent piece of information that is included in all these different areas of impact is the apparent total lack of knowledge of the preparers, or the lack of ethics. Unfortunately, the results are the same. Each preparer should agree to stand on a bare piece of ground, without ear plugs or muffs, and feel the tremendous energy of that much sound and wind. Not once in a life time, but continuously, at irregular times. This is now occurring in West Texas. This is extreme, chronic, artificial mental tension, the most unhealthy environment known to humans.

4.3.2 No-Action Alternative, Pg. 4-45

No Action to be taken

4.3.3 Cumulative Impacts, Pg. 4-45

These flights are, in addition to the above negative facts, an invasion of privacy and private property. They should be stopped as soon as possible, and the minimum altitude for any jet fighter aircraft should be set at 1,000 feet AGL. It isn't a question of damage, it's a question of how much damage.

4.4 AIR QUALITY, Pg. 4-47

4.4.1 Proposed Action, Pg. 4-48

Few of the technical words in this section have very little relevancy to the subject of Air Quality as it applies to this EIS. The thrust of this EIS is to show little or no pollution at or near ground level. No one wants Alamogordo to be like Albuquerque, New Mexico. Once above 5,000 feet AGL, no one seems to care what the USAF dumps. The variables in the computations using the various Tables is in the use of "Models", "Averages" and "Weighted Averages". These "Models" can be manipulated to "show and tell" any information that is required relative to emissions discharge. As noted in Section 4-2 on Noise, the USAF owns and operates some very dirty machinery. In order for the USAF to meet established standards of emission

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control, whatever they may be, something must be done. Let us say we are analyzing a GAF PA-200 Tornado jet fighter:

1. Start the motor, motor is idling - - - X lbs. of CO & NOx for 10 minutes
2. Rev up the motor, taxi to the runway - X lbs. of CO & NOx for 18 minutes
3. Full throttle and take off - - - - - XXXX lbs of CO & NOx for 3 minutes
4. Cut back on the throttle and cruise - - - XXX lbs of CO & NOx for 2 hours

With this set of variables, we have a wide variety of information. The question is, what information shall we publish? We have four different operating functions of this PA-200, four different throttle settings and four different time frames. The one factor missing is: what is the air speed? 380 MPH? 552 MPH? The faster they fly, the more emissions. The lower they fly, the more ground level pollution. We find no air speeds in this EIS. To help negate the effect of Surface-to-Air Missiles, it is necessary to fly these routes at, or near, the speed of sound. This high speed will use more fuel and generate more pollution than calculated by the USAF. We assume the USAF will not train these pilots at other than actual combat conditions.

It is a simple matter to create a "Model" from all the known values involved. Like standing on "spot A" while a five gallon bucket of water is dumped from 5,000 feet AGL on your head. Or, five gallons of water from 100 feet AGL on your head. Which one will get you wet? Which flight will pollute the ground? Neither the 5,000 foot bucket of water nor the pollution from the 5,000 foot flight will reach the ground. See page 4-51, para. "Summary Of Aircraft Emissions", line 8.

The Trans-Pecos Area of Texas is going to get very polluted from the 5,000,000 tons per year of CO & NOx dumped on us at 100 feet AGL. Neither the ranchers, hikers, vacationers, Sierra Blanca, Van Horn, Marfa, Alpine, Marathon or Fort Davis will be able to smell the Mountain Clover. The stink won't happen this year or the next, but the worst is yet to come. Even now, when a heavy dew rises on some mornings, you can still smell the "kerosene" in the grass from the "boomers" that hit here in 1996. These MTR's cover 10,000 square miles of private land. That's 10,000 square miles of pollution.

We did determine that with the present number of aircraft, plus the 30 additional GAF PA-200's, the 19.2 sorties per day of jet aircraft will equal the air emissions of 1,860 automobiles per day driving the long loop of IR-102/141 or IR-178. Some of the USAF Tables and technical language do not relate to each other. Some are simply contradictory to each other. There is a mixture of miles per hour and knots per hour. Mixing of these two factors indicates the Corps of Engineers has a shortage of technical writers. This exercise on "Air Pollution" is the same type exercise as the one on "Noise".

One thing we did determine is, when taking the different tables, assigning the correct air speed of 460 knots (552 MPH) and other factors set forth in

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the USAF's statements in other sections, the amount of polluting discharge will increase by a factor of 71.1% over what the USAF shows. Of course, we are never sure if the base values set out by the USAF are true and correct, the polluting factor could be higher. But we always use the data from this EIS.

To simplify things, let's say the largest short term pollution will be greatest at Holloman AFB due to the large amount of combined aircraft, motor vehicles and stationary motors. The pollution we are concerned about is the long term pollution of tons of poisons and particles of unburned fuel released in the air and on the ground here in the Trans-Pecos Area.

4.4.2 No-Action Alternative, Pg. 4-62

No action on this EIS is necessary.

4.4.3 Cumulative Impacts, Pg. 4-67

The pollution factors will rise in proportion to the number of sorties flown by the USAF over IR-176, IR-102/141, and of course the MTR's flown in New Mexico. We know there are home owners, ranchers and other business people in New Mexico complaining of the existing noise and pollution.

Again, there is no known study shown in any of the official documents, concerning the Environmental Impact of aircraft (one or more) flying at such unprecedented low altitudes. As with the Noise Level, the pollution of the air, land and all other Sections of this EIS have not been addressed by the USAF. All information in this EIS, 1997, relates to airfields and other prominent aircraft zones of operation. Again, not one of the states in the United States, not one of the NATO nations, want this program. That should tell our government something.

4.5 BIOLOGICAL RESOURCES, Pg. 4-67

4.5.1 Proposed Action, Pg. 4-67

This assessment is fraught with some basic misconceptions. Among our group of analysts are some outdoorsy women and men. Some are hunters, some of us combine hunting with just watching wild animals. One thing we all agree on is an unnatural, chronic disturbance of a wild animal is cause for it to leave the area, if it can. It does, of course, depend on the availability of the proper food, ample clean water and shelter. The same as we humans.

For whatever reasons, the USAF has, more or less, ignored basic facts of nature. The USAF should read all the works of Dr. Desmond Morris, Zoologist. There will definitely be a migration of mobile animals from these IR's and

VR's. If they could, all domestic livestock would also leave. They are generally fenced in.

We know all of the opinions by such authorities as our Fish and Game Department, or the Texas Parks and Wildlife Department at the state and national level. However, in our conversations over the past forty years, we have discovered even the well-educated, Government Employed Naturalists lack the experience of application of their education. A formal education is a rough diamond. The experience of application is the polish.

Members of our group have the formal education and experience with animal behavior, genetics, veterinary and allied studies of domestic and wild animals. The authorities quoted in this EIS are only partially correct in their statements.

We have had extensive education and experience in operating the first Game Ranch in Texas, in the 1950's and 1960's, for the purpose of Lease Hunting of (mail, Mule Deer and Javalina. We have studied the migration and habits of all animals in this area, game animals or not. We found we accumulated a large deer herd, large coveys of quail and javalina due to the lack of any disturbance by alien (unnatural or unusual) presence or activity. There was no livestock on the 43 sections.

A week before hunting season, preparation of facilities increased the alien presence of vehicles and people. Everything is relative with wild animals. They are very attuned to sight, sound and smell. We've watched mule deer slowly walk off as far as twelve miles because of the alien noise of tapping two small rocks together. During hunting season, the influx of vehicles, camping noise, laughter, conversation or just the click of twigs and rocks can cause large migrations of deer, elk and javalina.

This is before the occasional noise of high-powered hunting rifles. When the shooting starts, most mature deer, quail, javalina, coyotes, bear, mountain lions, all the smaller cats and even some porcupines and badgers would leave. Occasionally, they will not leave an area for any reason. The variables have to do, of course, with survival. In high and normal rainfall years, we found our game herds would scatter off the 43 sections of land. In normal and low rainfall years, they wouldn't leave unless very stressed. For the wild animals, here was a known factor of ample water, feed and shelter on the 43 sections. Oh yes, two families of mountain lions hunting the 43 sections would deplete all types of wildlife within six months, either by killing or from migration.

During the off-season of hunting, we had vacationers, campers, hikers and other outdoor types of people use the 43 sections of land. We would not charge any admission other than a cleaning fee. We allowed no trash or chemicals on the ranch and kept 5 windmills in operation year round. We insisted on scattering our off-season visitors for the purpose of balance. We found that if there was no activity within the 43 sections of land, a large

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percentage of wild animals from the surrounding ranches accumulated on the 43 sections of Game Ranch Resources, and we had over-populations that caused overgrazing.

When we read, or hear, the opinions of the state and federal Fish & Game authorities, or read in this EIS what the USAF thinks will occur to the Biological Resources, we realize they lack the polish of their education.

All animals respond to alien occurrences in different ways. Deer will walk away; sometimes for 10 or 15 miles. Quail will do the same. Coyotes will adapt to almost anything. Wolves will move out of an area reluctantly, as will mountain lions, bob cats and civet cats. Elk will migrate. Skunks are immune to anything but rattlesnakes. Most game animals and birds will migrate, thus causing a reduction in income to domestic and game ranchers that have Lease Hunting. All animals can be conditioned to accept unnatural environments, but always at the cost of their health. No one will ever win an argument with "Momma Nature". Remember Dr. Pavlov's experiment with dogs? They all died of ulcers.

Hunting leases constitute a large proportion of income in today's Trans-Pecos Economic Environment. Some ranching operations could not exist without it. Some ranchers won't lease hunting rights. They don't like leasing due to the intrusions of strange people, or destruction/damage to livestock and facilities. Most ranching businesses have hunting lease income.

4.5.2 No-Action Alternative, Pg. 4-82

4.5.3 Cumulative Impacts, Pg. 4-82

We only have information relative to the 13 years of low-altitude flights along IR-178 concerning the improvement, or depletion, of Biological Resources. It definitely would be very beneficial for the EPA to use this MTR as an experimental area for educational purposes.

We have contacted 3 ranchers who have been greatly abused by the low-flying jet aircraft for these 13 years. Unfortunately, none of them are agreeable to taking part in such an experiment. The reason for this attitude in the confusion between the EPA and the Endangered Species Act (ESA).

Most ranchers don't want any wildlife authorities on their land. They fear, and justifiably so, the disruption of their private business, and possible loss of property.

However, we have been able to obtain a large amount of information, most of it outlined above. The consensus is:

1. Contrary to the USAF, all biological life forms are damaged by these low-level flights. Reality is, jet fighters flying at 100 feet, or 300, or 500 feet is just too low for natural life forms to tolerate. 1,000 feet should be the minimum for modern jet aircraft with noise and pollution levels that are

above those of the military jets now flying out of Laughlin AFB, Del Rio, Texas. We can find out what type aircraft they are, if you need to know.

2. IR-102/141 passes over the only herd of Elk in Texas located just west of the town of Marathon, south of the Glass Mountains. There are some Elk in the Guadalupe National Park, but they are mostly in New Mexico. The beginning of this herd of Elk was introduced in the late 1950's, and now numbers some 25 head and growing. Low-level flights over the wide valley and mountains they range in would be destructive to this Elk program.

3. The operation of these large, powerful jet fighter aircraft are not compatible with any environment but warfare. They were designed and built for that.

4. As set out above, there is no known study, in any of the EA's or the EIS relative to this low-altitude training program. In these official documents concerning the Environmental Impact of aircraft (one or more) flying at such unprecedented low altitudes, the USAF has created a new problem. As with Air Quality, SocioEconomics, Noise Levels, and all other Sections of this EIS, little has been addressed by the USAF relative to the MTR's and the 10,000 square miles they fly over. All basic information in this EIS, 1997, relates only to airfields and other obvious aircraft zones of operation. Again, not one of the states in the United States, not one of the NATO nations, want this training program.

4.6 ARCHAEOLOGICAL, CULTURAL AND HISTORICAL RESOURCES, Pg. 4-85

4.6.1 Proposed Action, Pg. 4-85

We have heard nothing from any of the Archaeological, Cultural or Historical organizations listed in the EIS, 1997. We will contact them a second time. Mr. Hugo Gardea of the Texas Historical Commission has not yet been contacted. Our conversations with his staff generated interest in the situation, and they too have had no response from the USAF relative to their request to be advised of the progress of EIS, 1997.

4.6.2 No-Action Alternative, Pg. 4-92

Recommend no action for this proposal

4.6.3 Cumulative Impacts, Pg. 4-92

We can find no letters of response from the USAF to the Texas Historical Commission concerning this proposal.

4.7 WATER RESOURCES, Pg. 4-92

W-415

4.7.1 Proposed Action, Pg. 4-9

We do not know of any impact on the surface or underground water sources in the State of Texas. This EIS, 1997, is a study concerning water in New Mexico, that is available to the city of Alamogordo and Holloman AFB. We have no knowledge of the aquifer draw-down capacity, the supply system or the other mechanics. However, we can find out if this is important.

The only comments we have heard concerning water is the destruction of windmills that supply water to livestock and wildlife in Texas. These are always repaired or substituted for in a short time by the owners.

4.7.2 No-Action Alternative, Pg. 4-98

No action is recommended for this EIS.

4.7.3 Cumulative Impacts, Pg. 4-98

The EIS, 1997 indicates that there is a limited amount of water in the area of Holloman AFB, and the water table is dropping. The available water in this aquifer will become saturated with gypsum should there be too extensive a draw-down. This is true of any water source in the area of White Sands National Monument. (Gypsum Dunes)

4.8 HAZARDOUS MATERIALS AND WASTE MANAGEMENT, Pg. 4-98

4.8.1 Proposed Action, Pg. 4-98

We have no comment on the Hazardous Materials and Waste Management. There was no comment made concerning any poisons along the MTR's other than the tons of fuel particles, the CO and NOx. Then we have the new addition of jet fuel spills from the PA-200's refueling each other.

4.8.2 No-Action Alternative, Pg. 4-100

We recommend a No Action decision on this EIS.

4.8.3 Cumulative Impacts, Pg. 4-100

4.9 SOCIOECONOMICS, Pg. 4-101

4.9.1 Proposed Action, Pg. 4-101

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There is no part of any of these EA's or EIS concerning the Social/Economic Structure of the Trans-Pecos area of Texas. The USAF consistently ignores the social structure, minority races and the depressed

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economic status of the majority of the citizens of this area in direct contradiction to:

- (1) Presidential Executive Order #12898, Environmental Justice, page 3-121, para. 3.9.8 and Figure 3.9-1, page 3-122
- (2) The fragile economic balance between an expanding economy versus a subsistence or decreasing economy.
- (3) The economy of any Trade Area depends on the ratios of "new money" to subsistence income. At the present time, the Trans-Pecos Area is primarily an agricultural community, but with several incentive programs managed by a combination of the Texas Commerce Department, private donations in the Trans-Pecos Area and a newly established local organization, we now have a growing trade area. This USAF training program is directly counter-productive to all our efforts. Detailed information of our accomplishments is available on request.

In order of cash-flow volume of "new money" into this Trade Area the following are the known sources:

- A. Cattle, sheep, goat ranching, hunting/camping leases
- B. Sul Ross University, Texas University System
- C. Retirement population
- D. Welfare recipients
- E. Tourist Visitors
- F. Southern Pacific Railroad Employees
- G. State and Federal Employees
- H. Motion Picture Industry

4.9.2 No-Action Alternative, Pg. 4-105

No action of this proposal required

4.9.3 Cumulative Impacts, Pg. 4-105

The retirement and tourist economics have been on the rise the past 5 years. For a while, there was a decrease in these two "new money" sources. It could have been the national economy, or it could have been the drought. We have had three motels built in the past three years. When interviewed, the managers informed us their studies indicated there would be an increase in occupancy from two sources. (1) The increase in enrollment at Sul Ross University brings more friend and family related visitors, and (2) the vacation overnight facilities at Big Bend National Park would not be expanded due to cuts in budget by the National Park Service (NPS), and the controversy over NPS service contractors.

Outside the towns, private land owners are planning additional business enterprises. Cattle, sheep, goat ranching, hunting/camping leases business

enterprises have plans to provide destination facilities for camping vacationers. These camp grounds are being constructed in some very beautiful, high altitude country. Some initial plans are for a number of very well arranged campsites with electricity, potable water, rest rooms, showers and access to hiking and helping ranchers with their goat, cattle and horse operations. All this at a cool summer altitude of 5,400 feet ASL. These are mostly small areas for families (No KOA's).

The present impact of low-level training flights by the USAF has been noticed by various tourist, hunters, campers and mostly by the private businesses related to outdoor activities as well as the ranching businesses and the ranch employees.

There is another tier of SocioEconomic Impact. With the progressive expansion of these sorties up to approximately 40,250 per year, the danger of highway accidents will increase, as will accidents to ranchers, ranch employees, hunters, hikers, campers and eventually to residents of the towns in the area. Then, as has occurred in New Mexico, the USAF decides it would be good training for the NATO air forces if these pilots could do training at super-sonic speeds as well as sub-sonic. Then, with so much "Mega-Bucks Business" at hand, NATO, or the USAF, would discover a need to increase the numbers of IR's and Visual Routes (VR's).

As the Colonel at the July 7, 1997 "Public Hearing" stated, "This training program will go on indefinitely".

The USAF started this training program on a small scale with only IR-178 "modified" from a minimum of 500 feet (AGL) down to 100 feet AGL. Again, with the weight (45,000 to 60,000 pounds), the speed 500/552 miles per hour (MPH), the high noise level with the gale force winds generated, the minimum height should be raised from 500 feet AGL to 1,000 feet AGL.

4.10 TRANSPORTATION, Pg. 4-106

4.10.1 Proposed Action, Pg. 4-106

No Comment

4.10.2 No-Action Alternative, Pg. 4-108

4.10.3 Cumulative Impacts, Pg. 4-108

None to the Trans-Pecos Area

4.11 UTILITIES, Pg. 4-109

4.11.1 Proposed Action, Pg. 4-109

No Comment

4.11.2 No-Action Alternative, Pg. 4-113

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4.11.3 Cumulative Impacts, Pg. 4-113
None to the Trans-Pecos Area

4.12 SOILS, Pg. 4-113

4.12.1 Proposed Action, Pg. 4-113

No Comment

4.12.2 No-Action Alternative, Pg. 4-118

No comment

4.12.3 Cumulative Impacts, Pg. 4-118

None to the Trans-Pecos Area

4.13 SAFETY, Pg. 4-118

4.13.1 Proposed Action, Pg. 4-119

To quote one citizen's letter to one of our member's, "These guys moving at 300 or more knots (official speed is 460 knots) will not have a chance to detect any other aircraft in their path, especially at very low levels where they plan to fly. I fear that sooner or later they will encounter a rancher pilot looking for cattle, or a helicopter working cattle, or a pipe line patrol aircraft, or a border patrol flight, or a glider, or any of the many other legitimate and legal types of aircraft using the same area. If and when they do can you imagine the outcry that will take place from the public? Another forty (30 additional) aircraft taking part in these training flights will multiply the danger to a very large extent."

There is a genuine threat of danger in these low-level flights.

Instruments only at 100 feet AGL, and air-to-air combat exercises at 300 feet AGL. These will be well trained, and sometimes experienced pilots, sometimes not. Our USAF advisers inform us that of the two, the air-to-air combat is the most dangerous. It will be manual control, not instrument. When I fly even light aircraft, the instruments (automatic pilot) can out perform the human.

In the instrument training flights, the exercise is designed to force the pilot to surrender control of a progressively faster moving aircraft, within progressively closer proximity to the ground, to some control other than her/himself. Psychologically, this is difficult for some fighter pilots.

Crashes will be inevitable. At these low altitudes, should the machine malfunction, the pilots are trained to attempt an altitude rise in order to eject. There would be very little time for an attempt to correct the malfunction. The pilot is a more valuable an asset than the training aircraft. Conversely, the pilot/aircraft combination is a more valuable asset than the civilians. (See Code of Military Justice, The Articles of War)

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The final question is, where will the aircraft land. ("Auger in" is the term) The over-all damage to the environment will be small, but long-lasting. Of more concern to the environment are the thousands of hours of aircraft operation. At 100 feet AGL, the smell of burnt jet fuel lingers for two to three days, according to the wind. The vortex of air generated by the jet engine forces the hot gases to the ground in a circle.

Experience at constructing or modifying runway or approach lights at US AF air bases displayed the resulting damage of these exhaust gases even from small trainers like the AT-38.

In addition to this, there has been an unannounced addition to the proposed training flights. The EA of 1996/1997 for airspace modifications did not include an intent to refuel the PA-200 Tornado at 1,000 feet AGL by USAF tanker craft. Nor did it mention the intent to refuel the Tornado from another Tornado (The Buddy-Buddy System) at 1,000 feet AGL. Section 4.0, page 4-4, para 1.

We are advised by our Aeronautical Engineer and USAF advisor that there will be frequent inability to accomplish this refueling maneuver with thousand of gallons of fuel spilled. The purpose of high-altitude air-to-air refueling is the smoother air and the margin of safety from obstacles, such as the earth.

Again, as in the EA of 1996/1997, the USAF has made no assessment of the property of people under and around these low-level flights. The safety of the population, the damage to property and the irritation of no sleep at night have gone unaddressed.

4.13.2 No-Action Alternative, Pg-4-124

4.13.3 Cumulative Impacts, Pg 4-124

(1) Uncontrolled crashes of aircraft far in excess of USAF estimates, (2) fuel spills from hazardous maneuvers and (3) the safety of the owners and employees of the homes and business under and around the low-level aircraft.

5.0 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES, Pg. 5-1

This section has only one reference to the Trans-Pecos Area. The reference to "Short-term uses of the human environment and the maintenance and enhancement of long-term productivity." If this were really a short-term training program, under some conditions, this program might be acceptable

as there could still be long-term productivity. However, as the USAF Colonel said, this program has no end that the USAF knows of.

The 60 REFERENCES, Pg. 6-1

Our investigation and analysis (I & A) indicates that, as stated by the USAF in the EA of 1996/1997 and the EIS of 1997, there is to be a continued expansion of this training program. Our I & A also indicates that in reality, the USAF will have no concern for the welfare of citizens living in the Trans-Pecos Area. We base this opinion on the following facts:

1. We have found many people who have complained about the noise, gale force winds, the fumes of "kerosene" from the jet motors, and the loss of windmills and livestock associated with these training flights. We know no one who has received any return calls from the USAF, or anything in writing. The calls to the number they give out meet with a, "We will look into it", then silence.
2. We have numerous witnesses from the towns of Alpine, Sierra Blanca, their surrounding areas and satellite developments that the USAF does not fulfill their stated policy. Contrary to the statements in this EIS, they do not, and we quote: "fly at a higher elevation over the towns, or over ranch residences, county sub-divisions and commercial buildings".

3. We have various sources of USAF information that advise us the USAF, as they state in the 1996/1997 EA and this 1997 EIS, will train pilots in nine additional type USAF aircraft on IR-176 and IR-102/141. We have information that the United States Navy (USN) and their subsidiary service, the United States Marine Air Corps (USMACV) will also train over these routes. These sources also advise us North Atlantic Treaty Organization (NATO) countries, other than the German Air Force (GAF) will train over these routes. NATO countries are contracting with the United States Government (USG), through the USAF, to train their military pilots over these same routes, and they will be based at Holloman AFB. The intent is for Holloman AFB to be a national/international center for this training program.

We have been advised by the USAF that this low-level type training has been ejected from England, Germany and the State of Virginia. In addition, there are now 7 to 9 USAF training bases in the United States (US) that will move their low-level training flights to Holloman AFB.

4. We have been advised by legal counsel that these flights on IR-176 and IR-102/141, flying at 100 feet AGL, fly more through developed, private property than over it. These routes encompass, as now indicated, over 10,000 square miles (SM) of private property. These flights constitute illegal trespasses over that 10,000 SM area.

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In the USAF document, in each of the above categories listed in the index under 4.0, ENVIRONMENTAL IMPACTS, we find very little discussion, reference or awareness of the Trans-Pecos Area. There has been no SocioEconomic assessment done for this part of the training program.

In each of the categories listed in the index, under the heading of ENVIRONMENTAL IMPACTS, we find the repeated statement that there will be no impact, destructive or constructive, for the areas of Texas that are under IR-17's and IR-102/141. This 10,000 plus square miles will be highly impacted. It is not a question of will there be damage to this vast area or not, it is only question of how much damage there will be.

There has been a premeditated progression of interactive parts to one final conglomerate that will create an international low-level training site in this area of the United States. This program will earn billions of dollars for private corporations.

The following are a major part of this complaint. We have used the available technical information published by the USAF in this EIS to formulate our opinions.

4.1 Airspace Use And Management

Lack of correct management by the authorities at Holloman AFB is demonstrated in the conduct of the pilots in training. There are numerous documented accounts of accidents caused by these low-level flights, loss of sleep, difficulty in caring for injured or sick people and the non-compliance of the USAF's stated policy that there would be "no flights over towns, residences or businesses".

4.2 Noise

Lack of correct USAF calculations of high noise levels on MTR's, especially on routes IR-178 and IR-102/141, is a result of "Models" that are not applicable to the low-level training flights proposed by the USAF. The basic data used to formulate these "Models" is not applicable to jet aircraft. Then, to compound the mistake, these "Models" are weighted averages based on the incorrect air speed.

4.3 Land Use

The basic approach to this category is this statement: "However, relative increases in noise and potential overflights experienced in portions of western Texas would appreciably alter the natural quiet for scattered rural residents". This is true at the present time. In the near future, it will be more so.

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4.4 Air Quality

Lack of correct USAF calculations of higher aircraft operating speeds, relative to the use of factors reflecting actual flying conditions, has failed to show the actual extent of pollution along IR-178 and IR-102/141 in west Texas as well as the remainder of the routes and ranges.

4.5 Biological Resources

This USAF assessment is incorrect in all areas. The basic statements in all USAF EA's and EIS's assume there will be no long-range impact of plants or animals, whereas there are areas already impacted along IR-170 from the identical training flights that will take place on IR-102/141.

44.6 Archaeological, Cultural And Historical Resources

We have had no response in writing from the Texas Historical Commission. The Commission has, however, shown an interest in our investigation and complaint, as they have received no response to their request for information relative to these proposed additional flights.

4.7 Water Resources

We have no knowledge of any impact concerning the water resources in New Mexico. We have much knowledge of impacts concerning windmills and other water supplies in Texas. However, with so many deviations from acceptable standards of engineering and application thereof, we have become very suspicious.

4.8 Hazardous Materials and Waste Management

We are primarily concerned with the spilling of jet fuel and the known amounts of CO and NO_x.

1.9 Socioeconomics

To our group, this section of the EIS is a total disaster. The complete USAF disassociation of the critical part of the Socioeconomics of the Trans-Pecos Area is unconscionable. Not enough can be said about such a major omission.

i.10 Transportation

TRANSPECOS
We have no comment on this section as it does not effect the Trans-Pecos Area.

i.1.1 Utilities

We have no comment on this section as it does not effect the Trans-Pecos Area.

i.12 Soils

We have no comment on this section other than a concern with these jet fighter aircraft blowing dirt in our eyes and down our shirts.

4.13 Safety

We can acknowledge the fine technical work involved by highly skilled mechanics, electricians and electronic experts that make up the ground crews. Our main concern is the ever present "human error" and the natural law of chaos (Murphy's Law). This entire proposed training program of low-level training flights reminds us of a long ago conversation with then Colonel "Chuck" Yeager. He stated the average career percentage of mortality for fighter pilots in the USAF was 31.2%. These pilots are trainees. May God help them.

Respectfully,

Harold Bryan Kelley, CPCM
Business Economist
Post Office Box 605
Alpine, Texas 79831
Telephone (915) 364-2323
FAX (915) 364-2299

Attachments:

Newspaper Cartoon
EIS analysis
Separate Letter of Inquiry
News articles
Technical Information, USAF F-4 Fighter

Anthony Sforza, M.D. Family Medicine

HC-65, Box 21-B
915-364-2223

Alpine, TX 79830
July 25, 1997

Robert Lawrence
Environmental Protection Agency
1445 Ross Street
Dallas, TX 75202

Dear Mr. Lawrence:

This is a formal complaint regarding the "FINDING OF NO SIGNIFICANT IMPACT" filed by the United States Air Force (USAF) and the referenced document: "Final Environmental Assessment; Proposed Airspace Modifications to Support Units at Holloman AFB, NM; June 9, 1997."

These documents contain numerous and intentional omissions and misrepresentations. The reason I say "intentional", is that many of these omissions and misrepresentations were presented to them in verbal communication at public meetings and in writing. In face of reasonable public objections they have issued a "Finding Of No Significant Impact", and plan not only to go ahead with this new program, but to expand it.

The most significant omissions and misrepresentation involve socioeconomic, noise, air quality, and safety issues. Attached is a document presenting many of these intentional misrepresentations and omissions. If the USAF is allowed to go ahead with its plans, there will be significant and permanent damage to the environment and the health of the people of this area.

Sincerely,

Anthony Sforza, M.D.

Anthony Sforza, M.D.

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US EPA, DALLAS, TX
ASSOCIATE DIRECTOR
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COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

Enclosure 4

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Intentional Misrepresentations and Omissions in the United States Air Force (USAF) document:

"PROPOSED AIRSPACE MODIFICATIONS TO SUPPORT UNITS AT HOLLOMAN AFB, NM" (Ref. 1); Final Environmental Assessment.

1. Socioeconomic Impact. The socioeconomic impact of the proposal is conspicuously missing from the document. However, in the Environmental Impact Statement (EIS) of Ref. 2, made for the expansion of operations at Holloman AFB, the socioeconomic impact is a large section of the report. The reason it is detailed there, is because of the overall positive impact on that area. Many areas, including increased general income, reduction of unemployment, improvement in tax base, etc., are reviewed. In the presented Environmental Assessment (EA) (Ref. 1) there is no mention of the socioeconomic impact on the region under this airspace.

No mention is made of the blossoming movie industry for westerns in southwest Texas, which will be destroyed if this proposal goes through. Having these aircraft (approx. 20 per day) flying from 100-300 ft above ground level (AGL) will destroy the ability of movie-makers to take any shots on the horizon in our region, where we have great distant views. The relative flatness, great visibility (generally see 60-80 miles), low growing trees and shrubs that don't obscure the view for long distances, give great panoramic shots. It would be rather hard to convince the public that this film represents the old west in the 1800's if you have fighter aircraft flying across the horizon.

There is no question that having these warplanes flying across large pieces of privately owned land will diminish the value of these properties. Further, these air routes cross three state highways going to Big Bend National Park (and they intersect state highways and freeways in southwest Texas at least 13 times). It certainly will discourage new retirement housing in our area which has been blossoming in the past five years.

2. Misrepresentation of planned use. In Ref. 1 all the data that is shown is for 12 German Air Force (GAF) aircraft. The report indicates that over air routes IR-102/141 approximately 8 flights per weekday will occur. All data that was submitted indicated this number of aircraft as a basis of calculation; however, in Ref. 3 - Finding Of No Significant Impact, it is mentioned that the USAF is considering bringing in an additional 30 Tornado aircraft to Holloman AFB. In Ref. 2 on page ES-2 the following statements are made: "To support full training needs, MOAs and MTRs in the area would be used for low-level flight operations. This action would capitalize upon using restructured airspace from an unconnected previous proposal. That proposal, which is presently under consideration (Proposed Airspace Modifications to Support Units at

Holloman AFB, New Mexico (US AF, 1996), involves airspace modifications in southern New Mexico and west Texas." And further, in the same paragraph has the following: "If implemented, the modified airspace would be used by the additional 30 Tornados." It is clear from Ref. 2 that the USAF already has made plans for the 1999 deployment of additional GAF aircraft. This was left out of EA (Ref. 1) report, so that the numbers that were presented for noise, accident rates, burned jet fuel in the air, etc., would all be much lower than presented. These reports were presented by the same individuals and agencies. The actual planned flights are more than double the numbers used in this report. Had the correct numbers been used, there would have been a significant change in the final EA report.

3. Air Quality. Many people move to this area because of its clean air. The high desert is known as a good place for people to live who have respiratory problems. The views in this area are unusually clear and is one of the attractions to Big Bend National Park. You can routinely see over 80 miles. Both health and visibility are affected by increased levels of particulate matter.

From calculations based on information provided in Ref. 1 and Ref. 2, it is seen that the PA-200 aircraft puts out high levels of particulate matter less than 10 microns in diameter (PM10). Comparing the output per mile traveled the PA-200 puts out approximately 100 times the PM10 that a car puts out for the same distance. The F-4 aircraft puts out almost 200 times as much PM10 as a car. To put this in perspective, we will compare these flights to the equivalent of car travel. The plan calls for approximately 19 aircraft flights through this area per week day. This will result in PM10 levels of about 1900 cars per day traveling routes of up to 621 miles in this region. By the end of the week this is 9500 vehicles, or up to 5,899,500 car miles equivalent of PM10 production. This will have a definite adverse effect on air quality.

PM10 levels are particularly harmful to the lungs, since the particles are so small that they cannot be filtered out by the upper airways. Therefore these particles reach the most distant and smallest parts of the lung which are most sensitive. In addition, these hydrocarbons are toxic to this sensitive tissue. It is well known, and is even reported in the lay press as is demonstrated in Ref. 5, that PM10 levels increasing even below current EPA standards cause an increase in lung and cardiovascular disease. There is no question that the rising death rates from respiratory diseases, especially asthma, in the United States is caused in part by increasing PM10 levels.

These pollutants will not be dispersed at 5,000 ft above the ground (AGL), but mainly at 100 ft AGL. Further, no evaluation has been made for inversion layers which are not uncommon in this area, especially in the winter months. Often on calm cold winter days, the temperature in Alpine is 5 to 10 degrees colder than at homes in the surrounding mountains 1,000+ ft higher. This will trap these pollutants in these valleys.

The data used is not appropriate, and is slanted toward lower levels. Of the pollutant data supplied in Ref. 1 and 2, the following errors are noted. The air speeds for the TORO(PA-200) is only 405 mph for the CO numbers. In the rest of the pollutants it is at 450 mph. These are both wrong and low. The correct value as documented in Ref. 2 for the air-to-ground 100 ft AGL missions (the predominant mission in our area) is 480 knots or 552 mph. An error of over 100 mph. The pollutants go up exponentially with speed and thrust at these speeds (Mach 0.75 and higher). The numbers presented could easily be off by a factor of 2 or more.

4. Visual Impact. There has been no mention in the EA report of the visual impact of having these 20 warplanes flying at extremely low altitudes across vast areas of southwest Texas. One of the main considerations of people like myself who have moved to this area, has been the beautiful distant views. The land reminds you of what this country was like 200 years ago. There are virtually no structures that you can see because they are easily covered by the small rolling hills we have, and there are no significant numbers of telephone poles to see. And very few highways or other signs of modern civilization for vast distances. Our typical visibility is 60-80 miles, and because of the arid climate, we have low trees and bushes as the primary vegetation so as to pose no visual obstruction. Having 20 war planes a day, screaming across the sky with noise levels up to 70 dB SEL at 3.75 miles, will certainly destroy our tremendous scenery and tranquility.

The town of Alpine proudly displays a banner, "Home of The Last Frontier". People come to this region to see this beautiful country and experience what it was like hundreds of years ago. However, having warplanes screaming across the ground at low altitudes on roads enroute to Alpine and to Big Bend National park, would certainly give one doubts as to whether this banner should be flown any longer.

5. Noise. The noise data presented is a gross misrepresentation of what will actually happen to this area if these flights are allowed to occur. As stated by Col. Kurt Cichowski (that the noise caused by these planes would be less than) "the noise level of a vacuum cleaner operating 10 ft away is about 70 dBs." He further stated

that the elevated sound levels in the area with these military aircraft flying would be 28-59 dB's as is documented in Ref. 1. In Fig. A is a table from Ref. 2, that shows that the actual noise level that a person would hear from a Tornado aircraft would be at least 124 dB (which is at a lower speed and lower dB level than what is actually planned; 480 knots vs. 515 knots) and with the F-4's is 130 dB. With the F-4's the noise level is still 60 dB at an altitude of 20,000 ft. It has been well documented in multiple reports that noise levels over 85 dB will cause hearing damage. At levels over 85 dB for greater than 8 hours is considered to cause hearing damage. At 88 dB this would occur in 4 hours (Ref. 4). The increase of 3 dB doubles the sound intensity. In Ref. 1 on pg. 4-9, the USAF also indicates that the maximum amount of time per day that a person can be exposed to 115 dB without hearing protection is 15 minutes. Sounds levels above 130 dBs can cause immediate damage. Further, no mention is made of the frequency of the noise which can cause damage from resonant frequencies (such as an opera singer breaking a glass).

Figure B contains the data presented by the USAF in Ref. 1, which is incorrect. Anyone who has listened to a train whistle as the train comes down the track, knows that as the train approaches there is a high frequency sound followed by a low frequency sound as the train passes. This is because of the train traveling toward you in the same direction of the sound until it passes you. The sound waves are compressed as the train approaches you. With these aircraft flying at near Mach 0.9 or approx 9/10 the speed of sound at 5,000 ft, the sound frequency and suddenness of presentation is quite different than that shown in these diagrams. In reality the sound comes on and peaks very abruptly, causing a startle. The sound presents in a few seconds, and then there is a loud roar for a prolonged period of time following the jet's passage. This is shown in figure B and is marked as "Reality". Another analogy for understanding the suddenness of the sound of these aircraft, is the flight of a bullet which is traveling at supersonic speeds. We know that you can be hit by the bullet before you ever hear the sound. These planes are flying at near the speed of sound at this altitude, and therefore give you very little warning and a severe startle as they come up on you. This can cause an accident if you are on a horse, walking, on a ladder, or driving a car down the highway. This can be disorienting, and can and will, cause accidents. One of the purposes of flying at these extremely fast speeds close to the ground is for air-to-ground attack. These planes are designed to surprise the enemy. I do not believe that we should surprise individuals who are using their private land, in the same manner. On the lower half of figure B, a value of 113 dB is shown, however, as is indicated by the USAF in Ref. 2, a value of 124dB for the Tornado Aircraft and 130dB for the F-4 are the

correct numbers. To help understand these sound levels, sound levels of common sounds from Ref. 2 is presented in Fig D. It can be seen in this figure that compared to the loudness of a vacuum cleaner at 10 ft, the loudness at 120 dB would be 32 times as loud and would be uncomfortable.

The actual aircraft that will be flown on IR-102/141 are shown in Fig C from Ref. 1. This figure is amended to show that in 1999 this will increase to 1,549 sorties which converts to approx. 19 flights per week day (a sortie is from 2 to 4 or more aircraft flying at a time, separated by approximately two miles horizontal distance). Had these planned numbers been used, the numbers of the noise values would have been higher. Even though this was well known to the planners, this was not included in this document.

5. Over-pressure. The USAF has intentionally left out any mention of aircraft over-pressure when flying at these low altitudes. It is well known that there is wing down-wash and wing tip vortices generated by flying aircraft. The larger and faster the aircraft, the more energy is contained in these generated air currents. The Tornado aircraft at 61,700 lbs max weight, at 515 mph, at 100 ft above the ground, will cause a significant over-pressure and twisting winds directly under its flight path. These forces would be great enough to significantly damage agricultural windmills and small structures on private property, as well as add to the startle effect and potential for knocking someone off a horse, to the ground, or off a ladder. No data at all was presented regarding this matter, although the USAF should have multitudes of data on the subject. If the data is not available, it should be obtained and presented.

7. Accidents. No mention has been made in the report as to the potential for injuries as a result of these low flying aircraft flying over private lands. The assumption is made that the pilot will steer clear of any person, vehicle or structure by at least 500 ft as is required by FAR 91.119. However, flying at 100 ft above the ground at 515 mph over rolling and hilly terrain (as is part of its tactical design for surprise), it would be virtually impossible for the pilot to see a rancher riding on a horse, working on a windmill, or shooting a rifle, etc., and still be able to pull up and avoid this situation by more than 500 ft. The proposed route intersects state and federal highways at least 13 times along its route in Texas. It intersects many more county and ranch roads in Texas. This presents a great hazard to motorists on many of these winding state, county, and ranch roads. The startle effect of these rapidly approaching aircraft could definitely cause an accident. There has been no data presented simulating these conditions.

8. Aircraft Avoidance. We do have people visiting the area in light aircraft relatively frequently. They fly to Terlingua, to Alpine and to the small privately owned air strips in the area. Although this is a relatively small number of aircraft, the potential over time is significant for an air disaster. When aircraft come up suddenly from behind hills, it is impossible for them to see aircraft on the other sides of these hills. Flying at 515 mph after cresting a hill and dropping into a region that may be 1000 ft below the crest of the hill, it would be relatively easy to run into a private aircraft unintentionally. Even if the aircraft was not hit, the severe wake turbulence left by this jet could cause severe damage and loss of control of the light aircraft.

9. Potential Accident Rate. In Ref. 1, the accident rate quoted for these operations has been one accident in 76 years. The data shown in Fig. E from Ref 1 shows the figures presented by the USAF. The way these figures have been used both in this document and in public hearings is that the likelihood having an accident is once every 76 years. If you look down the chart you will see that the A-10 aircraft, which will also be flying this route, would only have an accident every 4,203 years. The fact that two have crashed in the last 3 months, and has been in the national news, makes one question how this data is presented.

Using the data presented, in 1999 there is a projected 1549 sorties with an average of three aircraft, with an average of one hour flight time each yields: 4,647 hours (not 534). At a 2.45 Class A mishap rate per 100,000 hours results in one Class A mishap every 8.78 years (not every 76 years). In addition when the USAF made these estimates and the made original presentation in Ref. 1, they were talking about highly trained and experienced GAF pilots. As is revealed in Ref 2., in 1999 the USAF will start training GAF pilots starting with inexperienced pilots for basic training, up to and including these high speed, low level flights. The likelihood for training accidents in new pilots increases significantly and has not been accounted for.

10. Federal Aviation Regulations. Currently there are two federal aviation regulations that are being asked to be waived. The first being FAR 91.117 - Aircraft Speed, and the second FAR 91.119 - Minimum safe altitudes.

FAR 91.117 basically states that aircraft cannot fly in excess of 250 knots below 10,000 ft (MSL). The USAF obviously wants to exceed this by going 515 mph down to 100 ft AGL. This is an unsafe condition is indicated above, and that is why this rule exists and should be maintained.

FAR 91.119 indicates that the minimum safe altitude should be 500 ft above surface and no closer than 500 ft to any person, vessel, vehicle, or structure. This is an old rule that was established before having aircraft with these high speed and weight abilities. There was no consideration at that time for having war planes that could fly at near sonic or supersonic speeds in the 500 ft safe minimums. Basically the 500 ft clearance should be raised because it is already an insufficient clearance for modern, more powerful, and larger aircraft. However, this rule functioned well if FAR 91.117 was observed, since aircraft would be limited to a maximum air speed of 250 knots below 10,000 MSL. These aircraft should not be allowed to fly at speeds greater than 250 knots below 10,000 MSL and should not be allowed to fly within 500 ft of a person, vehicle or structure, etc., over private land regardless of how sparsely populated it is.

11. Proposed Test. I propose a test be conducted to determine the impact on individuals who occasionally come under the flight path of these aircraft flying at approximately 100 ft above ground level at 515 mph. The test would be conducted on one of these ranches under the proposed air space over its naturally rocky terrain. At least 10 of the top officials from the USAF and the US Army Corps of Engineers that have prepared this document would be instructed on riding the local ranch horses. Then these individuals riding horses would stay in a 1-acre barbed wire fenced area. Approximately ten cattle and one bull would then be added to simulate ranching conditions. Then 10 sorties (over a period of time in one day) of 2 Tornado aircraft flying in close formation would fly over this one acre area at 100 ft AGL at 515 mph. Baseline audiometry and speech threshold testing would be done by a mutually approved agency and observed by the USAF and civilian representatives of the community, and the repeat of these baseline tests would be performed the day after the simulation was done. In this way we could test several theories: 1. whether there was any hearing damage caused by these flights; 2. whether this sudden startle would cause the typical ranch horse to rear-up and run or throw the rider; 3. document the number of injuries resulting from any accidents.

Of course the USAF should have emergency medical personnel on hand, and the participants should wear protective head gear. But think what could happen if they were required to act out the following scenario as a real rancher would experience:

These riders would not be allowed to wear any protective gear such as helmets or elbow pads since this is not normal attire for our ranchers. Of course no emergency vehicles would be present to

provide emergency aid since there is normally none available. Each individual that fell would have to crawl back to the closest ranch and call for emergency services. Then they would try to explain how to find them on this ranch with no road signs and no street addresses, so that they could be transported to nearest hospital which is approx 30 miles away. It would require at least 1-1/2 hours from the time the call is made to time they could be picked up and brought to the hospital. At that time, if the person had a head injury, they would need to be transported three hours by ambulance to the Odessa-Midland area. This is the nearest neurosurgery that is available in our region. The USAF would not be able to respond, since under normal circumstances unless a plane crashed, they wouldn't even know there was an accident.

References:

1. Proposed Airspace Modifications to Support Units at Holloman AFB, NM; Final Environmental Assessment; USAF Air Combat Command; June 9, 1997
2. Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico; Environmental Impact Statement; USAF, June 1997
3. FINDING OF NO SIGNIFICANT IMPACT; Chairperson, ACC Environmental Leadership Board; Susanne M. Waylett, Colonel, USAF; June 12, 1997.
4. Noise and Hearing Loss. NIH Consensus Statement Online 1990 Jan 22-24 [cited year month day];8(1):1-24.
5. Consumer Reports, August 1997, pg. 36-38; "Cleaning the air: Is our air clean enough?"

July 25, 1997
Anthony Sforza, M.D.

Table 4.2-1. Aircraft Maximum (L_{max}) A-Weighted Sound Levels at Various Altitudes

Aircraft Type	Altitude, Ft AGL									
	100	200	500	1,000	2,000	5,000	10,000	20,000		
F-4	130	124	115	107	99	87	75	60		
F-16	119	113	104	97	89	76	64	48		
F-117	127	121	111	103	94	79	65	46		
T-38	103	97	88	81	73	61	49	36		
Tornado-MTR,										
Air-to-ground	124	117	108	101	93	79	66	50		
Tornado										
Air-to-Air	117	111	102	94	86	72	60	46		
Other*	129	123	114	107	98	86	73	57		

* Representative data for other aircraft types using affected airspace (see Chapter 2.0)

** THESE VALUES ARE FOR 480 KNOTS
 IT IS STATED THESE AIRCRAFT WILL BE
 FLYING AT 615 TO 540 MPH I.E. HIGH 0.9
 AT 5,000 FT

FIG A

R2; 47

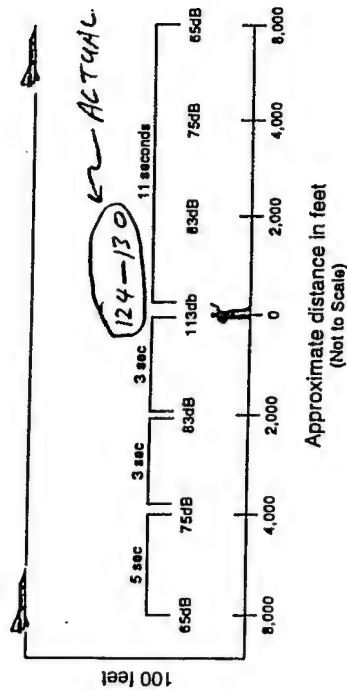
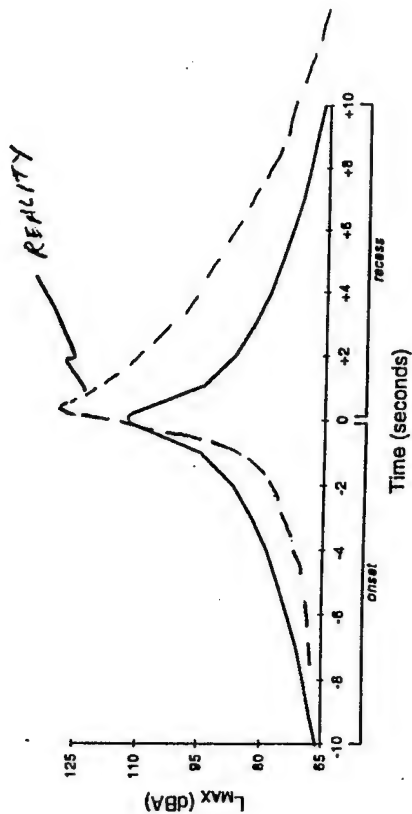


Figure 4.1-2 Noise Exposure from a Single Overflight of a PA-200 at 100 Feet AGL.

FIG B

R1; 47

approximately 80 percent of the time, and require about 0.8 hours of flight time. No ground disturbing activities would occur as a result of the proposed modification or use of the MTRs.

Although the ALCM routes to be consolidated have not historically been used for low-level aircraft flight, the majority of the area overlain by the proposed routes are currently under other existing MTRs. Only about 12 percent of the route corridor is not currently overflown by military aircraft.

IR-102/141 would be used for low-level flight training by a variety of potential users. It is anticipated that potential users would include, various DoD aircraft and DoD-sponsored aircraft. Table 2.1-1 lists the aircraft that would use the routes and the approximate number of day and night sorties each aircraft type would fly on each track in the course of a year. Day sorties are those that would be flown between the hours of 7:00 a.m. and 10:00 p.m., and night sorties would be flown between 10:00 p.m. and 7:00 a.m. Under the proposed action, most night sorties are expected to be flown before 11:30 p.m.

Table 2.1-1 Anticipated Annual Day/Night Sorties on Modified IR-102/141.

Aircraft	IR-102 Short Track	IR-102 Long Track	IR-141 Short Track	IR-141 Long Track
PA-200	96/10	24/3	224/25	56/7
F-4	5/0	0/0	20/0	0/0
A-4	2/0	1/0	5/1	1/0
A-6	2/0	1/0	5/1	1/0
A-10	2/0	1/0	6/0	1/0
B-1	7/0	2/0	17/0	4/0
B-52	4/0	1/0	11/0	3/0
F-14	2/0	1/0	5/1	1/0
F-15	2/0	1/0	6/0	1/0
F-16	10/0	2/0	22/0	6/0
F-18	2/0	1/0	5/1	1/0
F-111	2/0	1/0	5/1	1/0
HC-130	2/0	1/0	5/1	1/0
T-38	2/0	1/0	5/1	1/0
Total Annual Sorties	140/10	38/3	341/32	78/7
Average Day Sorties	0.6	0.2	1.5	0.3

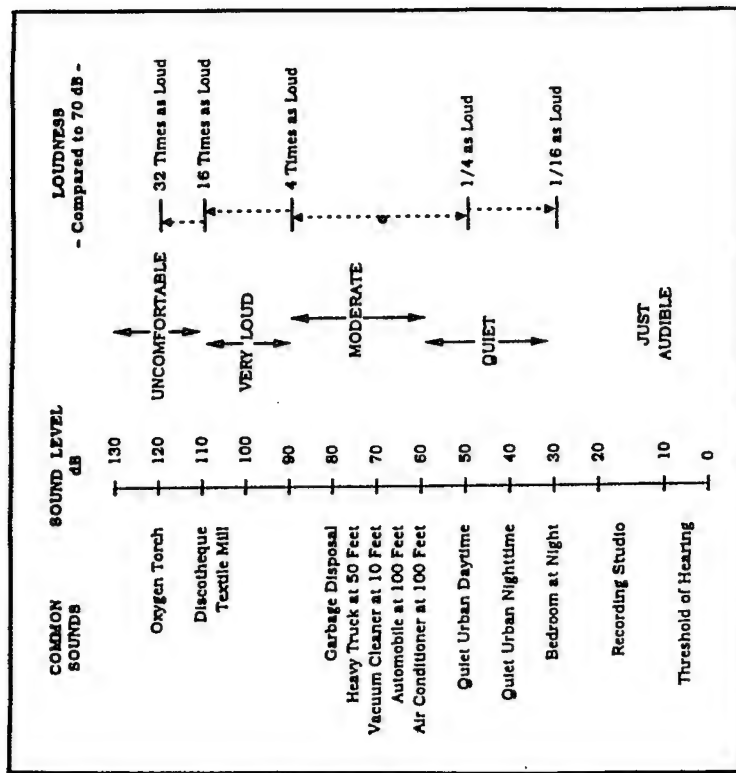
Note: First number indicates day sorties flown between 7:00 a.m. and 10:00 p.m.
Second number indicates night sorties flown between 10:00 p.m. and 7:00 a.m.

= 649,5001
IN 1999 W
INCREASE
1549 SA

FLTS = SORTIES X #
12-
≈ 19 FLTS PER WEEK

R11 2-5

FIG. C



Source: Handbook of Noise Control, C.M. Harris, Editor, McGraw-Hill Book Co., 1979.

Figure C-1. Typical A-Weighted Sound Levels of Common Sounds

FIG. D

R21 C-5

contamination plume. The locations and characteristics of surface and groundwater in the area will also affect the extent of contamination to those resources.

Table 4.1.4-1 Class A Mishap Projections.

Airspace	Aircraft	Class A Mishap Rate	Sorties per Year (Proposed)	Flight Hours per Year (Proposed)	Projected Years Between Mishaps (Proposed)
IR-102/ IR-141	PA-200	2.45	445	534	76
	F-111	6.22	10	12	1,339
	F-16	4.91	40	48	424
	A-10	2.60	10	16	2,403
	F-15	2.64	10	12	3,156
	F-4	5.79	25	30	575
	B-1	4.77	30	32	655
	B-52	1.29	19	30	2,584
	C-130	1.01	10	22	4,500
	F-18	2.07	10	12	4,025
	F-14	5.76	10	12	1,446
	A-6	3.33	10	12	2,502
	A-4	N/A	10	12	N/A
	T-38	1.60	10	12	5,208
Talon MOAs	PA-200	2.45	300	200	204
	F-4	5.79	970	647	26
	T-38	1.60	859	430	145

Source: Mishap Rates: USAF and USN Flying Safety Center. GAF Liaison

Sortie Levels: Air Combat Command.
Note: N/A = Not Available or Not Applicable

Disaster response capabilities already in place are fully capable of managing any emergency situation that may occur. USAF units maintain detailed mishap response plans. These plans assign agency responsibilities and prescribe functional activities necessary to react to major mishaps, whether on or off base. Response normally occurs in two phases.

The initial response considers such factors as rescue, evacuation, fire suppression, safety, and elimination of explosive devices, ensuring security of the area, and other actions immediately necessary to prevent loss of life or further property damage. Subsequently, the investigation phase is accomplished.

The initial response element includes the Fire Chief, who will normally be the on-scene commander. That element will include fire fighting and crash rescue personnel, medical personnel, security police, and crash recovery personnel. A subsequent response team

R1, 4-16

FIG. E

AIR QUALITY • SPECIAL REPORT

Clearing the air



Is our air clean enough?

It was what scientists call a "natural experiment," a serendipitous way to study, in this case, whether people would be healthier if the air were cleaner. An environmental economist at Brigham Young University spotted the research opportunity. A labor dispute had shut down the steel mill near Provo, Utah, for 13 months, removing the major source of air pollution (aside from cars) in the isolated mountain valley. The method he applied couldn't have been simpler. From the valley's three hospitals he collected counts of admissions for respiratory illness—before, during, and after the plant shutdown.

And the results could not have been more striking. When the mill was running, hospital admissions were 40 percent higher for bronchitis and 17 percent higher for pneumonia. Especially startling was the effect on preschool children: twice as many admissions for bronchitis and asthma.

Yet Provo's atmosphere didn't seem particularly bad. Even when the mill was in full operation, the valley's air was only slightly dirtier than national air-pollution regulations allow. That 1989 study is one of many dozens in the past decade that point to a worrisome new conclusion: Outdoor air—even air that meets present pollution standards—still can be hazardous to your health.

Scientists have detected a sizable and reliable connection between dirty air and health problems in dozens of communities large and small, old and new, in every type of climate, throughout North America.

So consistent is the association that epidemiologists can even estimate the annual U.S. toll from air pollution—about 50,000 deaths from heart disease, asthma, stroke, bronchitis, and the like. That's more people than die in auto accidents. Thousands of these deaths occur in places where air meets current national standards.

"I know of no other environmental risk factor where the exposure is so ubiquitous and the effects are so large," says C. Arden Pope, author of the Provo study.

After considering the evidence of previously unrecognized hazards, the U.S. Environmental Protection Agency (EPA) proposed strengthening air-pollution standards for the first time since 1990. The new regulations, which were expected to be published in July, were expected to be published in July.

The proposal has elicited strenuous protest from industries that contribute most heavily to air pollution: oil, autos, utilities, and heavy manufacturing. Resurrecting arguments shaped during previous clean-air debates, these industries predict that compliance would threaten thousands of jobs and intrude on Americans' lives.

They have sent dozens of lobbyists to churn up Congressional opposition. And employing a tactic increasingly common in health and environmental controversies, industries have launched a direct attack on the science itself. Typical is a Mobil Corp. newspaper advertisement asserting that the link between air pollution and illness is "based on shaky science" that is "unreliable" and "incomplete."

However, a close look at this "shaky" evidence shows that it is anything but. The real debate, in our opinion,

Ozone trouble spots



Already forced to control ozone
Will need controls under proposed standard

Deceptive Senate Censor Bill, Mr. Is downgraded of so many ozone sources that as polluters in the shed in the background correct in the air pollution current standard.

should be over how much air pollution we should tolerate.

Bad air, bad health

Proving a link between environmental pollution and disease is normally a daunting task. But in the case of air pollution and health, scientists have obtained remarkably consistent, significant results no matter where they looked.

Many of the studies have used a similar technique. They've compared deaths and hospital admissions with air-pollution measurements made by pollution-control agencies.

"All this data is publicly available," notes Joel Schwartz, associate professor of environmental epidemiology at the Harvard School of Public Health and author of many of the studies. "You find people dying from chronic lung disease, pneumonia and sudden heart attacks. These aren't people [already] lying in the hospital with tubes stuck in them. The biggest increase we find on high air-pollution days is in people dead on arrival at the hospital."

Two significant contributors to these effects are ozone and particulate matter.

Ozone. This is an unstable gas formed in the air by sunlight-induced reactions between two types of emissions, nitrogen oxides from combustion

and volatile organic compounds (VOCs) from sources such as gasoline and solvents. Ozone pollution gets worse when the weather heats up.

Ozone is beneficial in the upper atmosphere, but toxic below. It readily reacts with whatever it touches, which makes it irritating to living tissue. A few seconds in a high concentration of ozone is like opening your eyes in an overchlorinated swimming pool.

Many studies have found harmful consequences:

- Children at a Connecticut asthma camp were 40 percent more likely to have an acute asthma attack on high-ozone summer days than on average days. (Laboratory studies of asthmatic and normal volunteers suggest that ozone magnifies the effect of allergens and irritants that set off attacks.)
- The first results of an ongoing 10-year study of southern California schoolchildren has found a direct correlation between school absences and lifetime exposure to ozone.
- When healthy volunteers exercise in ozone concentrations like those routinely found outdoors in urban areas, their lung function deteriorates, they develop an irritable cough, and their airways become inflamed.
- Studies in nine major U.S. cities show that daily mortality rates increase along with ozone.

Improved in the past decade, ozone concentrations have declined 6 percent, and particulates are down 22 percent. But air in many areas still violates the standards.

Ozone. The standard, now the equivalent of 0.09 parts per million averaged over an eight-hour period, would be tightened to 0.08 parts per million. (Environmental and respiratory health organizations, prefer an even lower level—0.07 parts per million.)

The expected effect: millions fewer people losing lung capacity and 140,000 fewer cases of acute respiratory symptoms each year.

Particulates. These are what they sound like: tiny particles. Much finer than ordinary dust, they can be inhaled into the deepest recesses of the lung and lodge there for a long time. The most damaging particles, the very smallest ones, usually are by-products of combustion.

Their effects on people have been measured in many cities in the U.S. and in other countries: more respiratory illnesses and more deaths.

- A few weeks ago, researchers reported that infant mortality in the most polluted communities is 25 percent higher than in the cleanest ones.

A study of 13,000 children in 12 North American communities found that youngsters in the community with the worst fine-particle pollution had 65 percent more bronchitis than those in the cleanest community.

The most striking evidence comes from the so-called Six City study, in which researchers from Harvard and Brigham Young universities followed more than 8,000 adults for an average of 15 years, comparing their health status to local fine-particle counts.

The results: Residents of Steubenville, Ohio, the city with the most small-particle pollution, had a 25 percent higher mortality rate than residents of the cleanest city, Portage, Wis. The excess deaths were almost entirely from lung cancer and cardiovascular disease.

The researchers were so amazed by their findings that they repeated the study using an even larger number of people—500,000 adults in 151 communities. They got similar results.

Laboratory evidence is accumulating as well, says Schwartz, the Harvard epidemiologist. "Three different research groups have now independently reported that these particles produce the kinds of cardiovascular changes suspected in causing sudden death from heart attack."

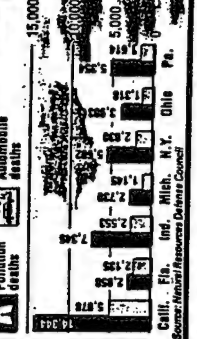
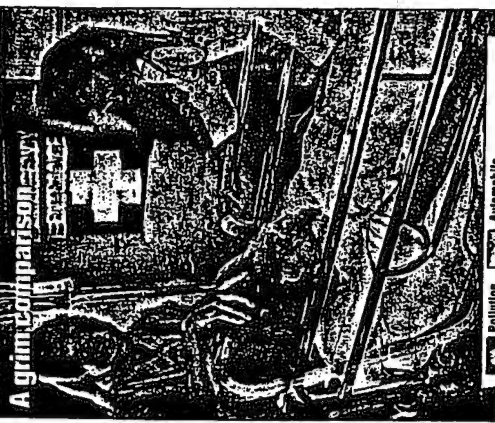
Tightening the rules

The U.S. passed its most comprehensive air-pollution law, the Clean Air Act Amendments, in 1970. Since then, the air has gotten a lot cleaner in some respects. Still, 121 million Americans—nearly half the population—live in areas where air does not meet existing health-based standards.

Nevertheless, the new health studies prompted the EPA to propose even stricter standards for ozone and particulates.

Ozone. The standard, now the equivalent of 0.09 parts per million averaged over an eight-hour period, would be tightened to 0.08 parts per million. (Environmental and respiratory health organizations, prefer an even lower level—0.07 parts per million.)

The expected effect: millions fewer people losing lung capacity and 140,000 fewer cases of acute respiratory symptoms each year.



Source: National Resources Defense Council

This change would mainly affect heavily populated regions that just barely meet current standards, such as the upper Ohio River Valley and the Carolinas. These areas would likely have to do what regions with even more ozone pollution have already done: Crack down on polluting cars, require gasoline and solvents with less vapor, and—above all—make industries and power plants clean up more of their emissions.

Particulates. The current standard treats all small particles—those measuring less than 10 microns—as one group. It turns out that industries can meet this standard by controlling the largest of the group, such as soot and power plants (to control acid rain) dust, while doing nothing about the very

fine particles—less than 2.5 microns—that scientists now realize do the most damage.

The EPA's proposal would add a specific limit for the very fine particles—an annual average of 15 micrograms per cubic meter, with an allowable 24-hour "peak average" of no more than 65 micrograms per cubic meter. The change would save about 15,000 lives a year and avoid 8,000 hospitalizations, the EPA estimates.

This change would have its biggest impact on the coal- and oil-burning industries and utilities and on diesel vehicles, which have largely escaped strict regulation under present rules.

The current debate

Not surprisingly, those very same industries are leading—and bankrolling—a vigorous lobbying and public-relations campaign against the EPA's proposal.

Many members of Congress—especially from the industrial Midwest—have taken up opposition to the EPA's proposal. Besides dismissing the science as shaky, the opponents scoff at the EPA's claim that the new rules will cost less than \$9-billion a year while returning health benefits of up to \$120-billion. Industry puts the cost at closer to \$60-billion—and says the EPA has overstated the value of the lives saved.

"A lot of people argue it needs more study," says Joe Lestell, spokesman for the American Petroleum Institute. "You shouldn't be spending all that money if you're going to get minimal benefits."

In fact, it is difficult for anyone to predict the cost. Those industries have made the same threats repeatedly over the years, but when regulations have changed anyway, the predicted economic disasters haven't materialized. For example:

- In 1980, industry warned that Federal rules requiring better sulfur dioxide pollution controls on large power plants (to control acid rain) would cost as much as \$150 per ton of electricity.

As we said in our report, "Facing Our Fears" (December 1986), the debate on such questions needs to be shaped by public values, supported as much as possible by hard information. We endorse strengthening the nation's air-pollution standards. The science suggests that the health benefits would be great, history suggests that industry's costs will be less than advertised, and the public has consistently shown that it wants the Government to make sure the air is cleaner.

of pollution removed, while the EPA predicted \$100. Actual cost: \$70 to \$100 per ton.

• In the 1980s, oil companies resisted changing to lower-vapor gasoline. They complained that the cost of gasoline would shoot up 3 to 5 cents a gallon and that there would be long lines at gas stations. "needs Bill Becker, director of the Association of State and Territorial Air Pollution Program Administrators. "Nothing of the sort happened. The cost increase was a fraction of a cent."

Policy analysts say this happens because, when given no choice, companies come up with new technological solutions. In fact, a study commissioned by the American Iron and Steel Institute found that steel mills in the upper Ohio River Valley could comply with the EPA particulate proposal at "minimal cost."

It's also very difficult to put a price tag on the health benefits. There are many different ways of calculating the cost to society of death and illness.

Recommendations

Even if industries' cost of cleaning up exceeds people's cost of breathing dirty air, that's no excuse to do nothing about it.

"Pollution is hideously expensive already," says George Thurston of the New York University School of Medicine's Institute of Environmental Medicine, the author of many air-pollution and health studies. "People are going to the hospital, they're taking medicines, they're taking sick days. What we are really talking about here is transferring the costs from the general public to the polluter."

As we said in our report, "Facing Our Fears" (December 1986), the debate on such questions needs to be shaped by public values, supported as much as possible by hard information. We endorse strengthening the nation's air-pollution standards. The science suggests that the health benefits would be great, history suggests that industry's costs will be less than advertised, and the public has consistently shown that it wants the Government to make sure the air is cleaner.

Post Office Box 1027
Cloudcroft, NM 88317
August 19, 1997

Ms. Sheryl Parker
Air Combat Command Environmental Analysis Branch
129 Andrews Street
Langley AFB, VA 23665-2769

Dear Ms. Parker:

I am adamantly opposed to the expansion of the German Air Force operations at Holloman Air Force Base and the construction of a target complex on Otero Mesa. Otero Mesa is a pristine region that is a multiple use area for recreation, sportsmen, and ranchers. It is also a critical habitat for wildlife.

I strongly object to the noise pollution from the low-flying aircraft, and its effect on the environment, wildlife, domestic life, and the quality of life in the Sacramento Mountain area. Public access to and use of the Otero Mesa area and access to outlying communities and ranches would be prohibited by exclusive military use. Military encroachment on private and public use land has to be stopped. Other military sites already in existence would be better suited for this operation, such as Red Rio and Cannon Air Force Base.

I am a native of the state of New Mexico, and have been a resident in Cloudcroft, NM, which is in Otero County, for 7 years. I chose to move here for the quality of life, the beautiful mountain surroundings, and the peaceful, serene, and pristine environment. I implore you to do everything in your power to leave it this way for future generations to enjoy.

Sincerely,

Carlene S. Briggs
Carlene S. Briggs

De Baca County Commissioners

814 AVENUE C, P.O. BOX 347
(505) 355-2801 FAX: (505) 355-2441
FORT SUMNER, NEW MEXICO 88119

August 27, 1997

Sheryl K. Parker
EIS Project Officer
HQ Air Combat Command/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, Virginia, 23665-2769

Re: Proposed Expansion of German Air Force Operations
at Holloman AFB, New Mexico

Dear Ms. Parker:

The De Baca County Commissioners and residents of De Baca County strongly oppose the Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico, in reference to De Baca County.

We believe this will be detrimental to the peace and tranquility of our county. There are complaints constantly about Cannon AFB flight patterns that disrupt people's lives not to mention the problems it creates for the livestock. The property damage from scared cattle that tear down fences, cracks in the walls of peoples' homes, and many other problems. This will only increase if this expansion is allowed to be implemented in De Baca County.

Again we want to voice our opposition to this expansion and urge that it not be considered for our area.

We sincerely thank you for allowing us to present our concerns and appreciate your help in voicing our request to the higher authorities.

Sincerely,

DE BACA COUNTY COMMISSIONERS

Frank McRae
Frank McRae, Commission Chairman
Edward A. Sena
Edward A. Sena, Commission Member

Raymond E. Drake
Raymond E. Drake, Commission Member

ATTEST: *Nancy Sparks*
Nancy Sparks, County Clerk



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sevilleta National Wildlife Refuge
P.O. Box 1248
Socorro, New Mexico 87801

Ms Sheryl Parker
Headquarters Air Combat Command/ CEVA
129 Andrews Street
Langley AFB, VA 23665-2769

July 16, 1997

Re: Draft EIS Proposed Expansion of German Air Force Operations
at Holloman AFB

Ms. Parker,

I am responding to the Draft EIS mailed to this office July 15, 1997 for review and comment.

Other Fish and Wildlife Service personnel will respond to your office referencing portions of the document they may have concerns about. As project leader of the Sevilleta National Wildlife Refuge there is very narrow and specific issue I wish to address.

Part of the low level flight training includes the MTR VR176 which includes all the Sevilleta NWR. This route is referenced in two Figures (2.1-7, 2.1-8) as it relates to the Sevilleta NWR within the Draft EIS. That route passes over an extremely sensitive captive breeding site for the endangered Mexican wolf.

The New Mexico Air National Guard has agreed to place a bubble (no fly zone) over that portion of the route that passes over the management facility. The corners of this bubble, its location on the refuge and in the state are noted on the enclosures. This action is a very welcome voluntary accommodation.

We feel it is necessary the Mexican wolf management area (as denoted above) be recognized in the Final EIS as an area to be excluded from all air operations conducted by Holloman. We are aware of the protocols involved with the use of airspace and MTRs that are administered by the various functional arms of the

Department of Defence. We further understand that program or agreement continuity within ALL government service is not a strong point. The formal recognition of the Mexican wolf management facility and the excluded airspace will go a long way to protecting this site and the Mexican wolf Recovery Program.

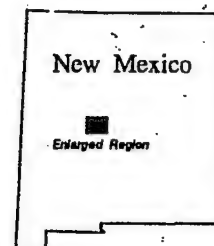
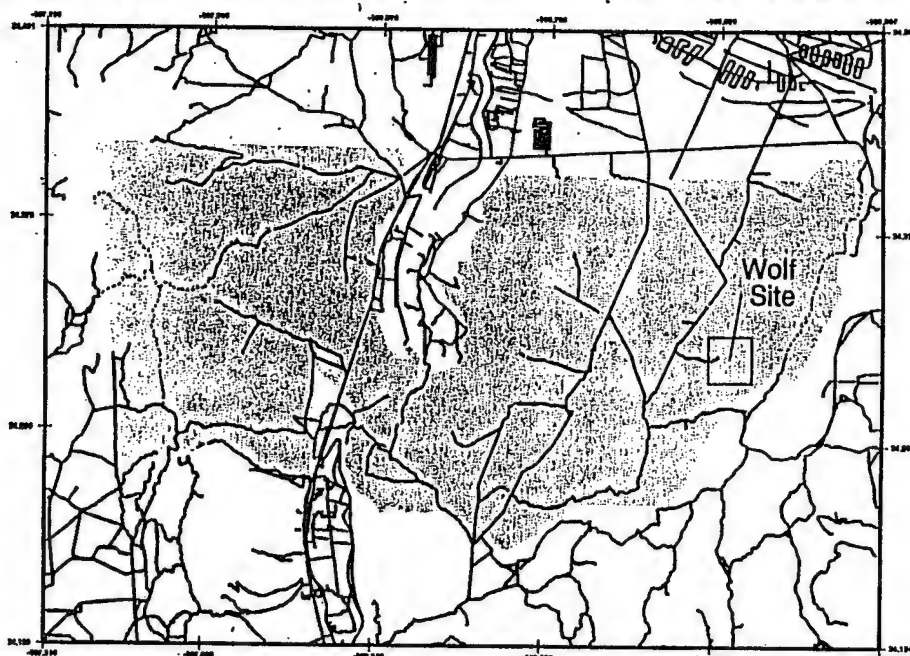
Sincerely,

Theodore M. Stans

CC
NMESO
Parsons ES/SE
Files

W-503

Seville National Wildlife Refuge



Captive Wolf Propagation Site:

Lat: 34 deg. 18' 11.4" N

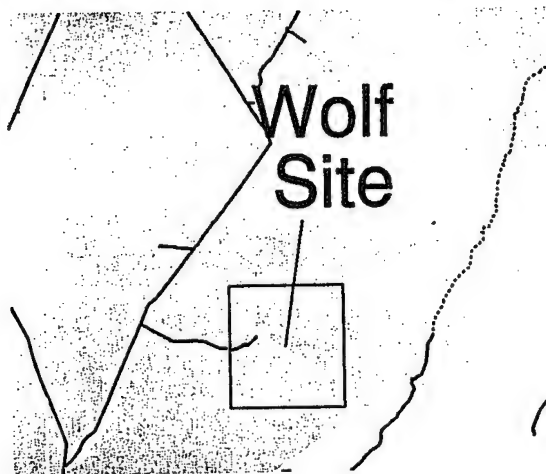
Long: 106 deg. 37' 19.9" W



Wolf Site four corner coordinates

34 deg 18' 38.4" N
106 deg 37' 52.6" W

34 deg 18' 39.9" N
106 deg 35' 56.4" W



34 deg 17' 1.9" N
106 deg 37' 50.7" W

34 deg 17' 3.5" N
106 deg 35' 54.5" W



United States Department of the Interior

NATIONAL PARK SERVICE
Carlsbad Caverns National Park
3235 National Parks Highway
Carlsbad, New Mexico 88220

IN REPLY REFER TO:

N1623

JUL 23 1997

Ms. Sheryl Parker
Department of the Air Force
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley Air Force Base, Virginia 23665-2769

Dear Ms Parker:

Carlsbad Caverns National Park is unsatisfied with the level of commitment that Holloman Air Force Base has put forth to mitigate or resolve our concerns with the Environmental Assessment (EA) for "Proposed Airspace Modifications to Support Units at Holloman Air Force Base, NM" and the Draft Environmental Impact Statement (DEIS) for "Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico". Our limited opportunity to comment was not commensurate with our status as a federal agency and manager of a nationally significant park area, especially considering the proximity of the proposed actions.

We have now reviewed the Final Environmental Assessment (FEA), dated June 9, 1997 and the DEIS. We find that together they do not satisfactorily address issues we raised to members of the planning team in meetings and in a letter dated January 16, 1997 (copy enclosed).

We still have the following concerns:

- (1) The wilderness character of the park will be adversely affected by the increased use and lowering of the flight floor of Instrument Routes (IRs) 192 and 195, and by the addition of the Talon Low MOA. The two IR routes and the Talon Low MOA virtually about designated Park Wilderness and stray flights into the wilderness are already documented. In a meeting with Holloman staff, it was brought to our attention that data is available on reported variances from flight paths. This data should have been summarized so that the National Park Service and the public could make an informed decision. Further, we have just received a copy of the DEIS which proposes increased use of these IRs. In 1995, 145 sorties were flown and this is expected to increase to 408 sorties per year, an increase of nearly 200%. The EIS goes on to estimate that 10% of these sorties would be 300 feet AGL or lower. At 100 to 500 feet AGL sound levels for

the aircraft being flown will emit between 90 and 125 db. Quiet, which is the standard for Wilderness, is around 30db. The potential for this level of noise is unacceptable when reasonable alternatives exist.

W-504

At meetings, and in our written comments on the Draft EA, we asked that portions of IRs 192 and 195 be moved to avoid the interface with Park Wilderness. We were told this was extremely difficult and likely would take years to accomplish. Thus the idea was dismissed by the Holloman staff, however, in the current Finding Of No Significant Impact (FONSI) it is stated that "In response to public concerns, the original proposal for ... IR-102 and IR-141... were modified to move flight operations farther away from several populated areas, to preclude overflight of some developed ranch and farm areas...". The message here seems to be that it was possible to move these flight routes away from ranches and farms, but that the U.S. Air Force does not take Federally Designated Wilderness seriously enough to bother moving flight paths away from it. This is unacceptable to the National Park Service. We resubmit that the following mitigative efforts should be taken:

- Near Section 9, Range 24 East, Township 26 South, a small irregular triangle of IR 192 ends abruptly at the Park Wilderness boundary. This irregularity in the route should be deleted completely to avoid high noise levels near Wilderness and to reduce the chance of unauthorized overflights.
- IR 195 and the Talon Low MOA about Wilderness on the extreme western boundary of Carlsbad Caverns National Park. This route and MOA should be narrowed to avoid this area completely. This area is also a Wilderness Study Area administered by the US Forest Service, an additional reason to adjust this air space.

We contend that these reasonable mitigation efforts are valid within the NEPA process (see National Environmental Policy Act @1508.20[e] which states that mitigation includes "Compensating for the impact by replacing or providing substitute resources or environments").

W-505

- (2) Carlsbad Caverns has one of the largest colonies of Mexican free-tailed bats in the country. Colony size has ranged from tens of thousands to several million over the years with current estimates over 350,000. This colony is nationally significant. During the summer months over 1,000 people per night come to watch the evening exodus from the cave. Bats are known to feed and/or migrate at altitudes exceeding 10,000 feet and our best information is that this colony leaves the cave nightly to feed as far as 30 miles in any direction. The Air Force proposes a significant increase in sorties during day and night along IRs 192, 194, 195, and 134, all of which are in the nightly flight path of this large colony. The Final EA dismisses this as a concern. We believe there is not enough information to dismiss this concern completely.

We have contracted with Dr. Troy Best, a bat researcher from Auburn University, to conduct a small-scale radio-telemetry study this year to gain information on where this

W-504

colony feeds and gets water. Unfortunately, the funding for this project is insufficient for getting conclusive information on bat flight patterns in regards to aircraft. At our earlier meeting with Holloman we requested assistance (financial and/or technical) to address this problem. We again request assistance in determining whether this colony is at risk from the increased use of these flight routes. The Air Force may have radar or other equipment and expertise that could contribute to the effort.

W-505

Thank you for accepting our comments. We look forward to working with the Air Force on these issues. You can contact Gary Vequist, our Chief of Resource Management and Visitor Protection, at 505-785-2232 ext. 360 for further discussion.



Frank J. Deckert
Superintendent

Enclosure

cc w/o enclosure:
Gary Vequist, CAVE
Bill Route, CAVE

cemail w/o enclosure:
Tim Stubbs, CAVE
Jan Wobbenhorst, NP-GUMO
Michael Eersole, NP-GRCA
Steve Oppermann, NP-RMRO
Wes Henry, NP-WASO



United States Department of the Interior

NATIONAL PARK SERVICE
GUADALUPE MOUNTAINS NATIONAL PARK
HC 60, BOX 400
SALT FLAT, TEXAS 79847-9400
915/828-3251

IN REPLY REFER TO:

SS815(GUMO)

July 25, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley Air Force Base, Virginia 23665-2769

Dear Ms. Parker:

The following material is in response to the invitation for comments on the Draft Environmental Impact Statement, *Proposed Expansion of German Air Force Operations At Holloman Air Force Base, New Mexico*, dated June 1997.

Guadalupe Mountains National Park has consistently expressed our concerns regarding the possible overflight of military aircraft over portions of the national park. We have made written and verbal comments on both the Draft and Final Environmental Assessment, *Proposed Airspace Modifications To Support Units at Holloman Air Force Base, New Mexico*.

It appears to us that both the proposed expansion to support the German Air Force and the proposed Modifications to Support Units at Holloman Air Force Base are very similar and related issues, particularly under the National Environmental Protection Act (NEPA) process. We contend that they are so similar and related that one NEPA document should have been developed for both actions. It is confusing to issue two separate NEPA documents, when one could have been prepared that more accurately reflects the cumulative effects of these two actions.

W-506

National parks are special places that our United States Congress felt deserving of recognition. The U.S. Congress also felt Guadalupe Mountains National Park had special wilderness values and authorized 46,850 acres as "Designated Wilderness". Visitors to our wilderness expect to find solitude and a place of natural quiet. Screaming military aircraft at less than 100 feet above the ground will definitely spoil their expected solitude. We understand that the military training routes (MTR's) were moved away from the park but we have not yet received confirmation in the way of a map and description from the Air Force at Holloman AFB. We requested this information verbally at a public meeting with the Air Force in Dell City, Texas on June 23, 1997. We followed up with a written request dated June 24, 1997 to the Public Affairs Office at Holloman AFB.

W-507

If the Air Force simply moved these MTR's to the park's boundary there is still the distinct probability that military aircraft will stray off the routes and over the national park. If the routes can not be moved well away from the park then the route should have a minimum above ground

W-508


W-508 level (AGL) flight restriction of at least 500 feet or preferably higher.

W-509 The scheduling of flights should be timed to have minimal impact on the spring and fall migrations of birds along the Delaware and Guadalupe Mountains. The Draft EIS has not determined the potential impacts on Peregrine Falcons, Golden Eagles, and Mexican Spotted Owls. All of these federally protected species are known to occur within proximity to the training routes.

W-510 Page 3-29 of the Draft EIS, under "National Park Service (NPS)", fails to mention that Guadalupe Mountains National Park has a Wilderness Area. It does mention other park's wilderness areas that are not situated as close to the training routes as is Guadalupe Mountains. Our park should be described in a little more detail to give the reader a more accurate picture, other than "...low-lying salt flats and sand dunes...". The act authorizing Guadalupe Mountains National Park described the park as "...an area in the State of Texas possessing outstanding geological values together with scenic and other natural values of great significance." The park also has Guadalupe Peak the highest point in the State of Texas at 8,749 feet.

In conclusion, we thank you for the opportunity to comment on the Draft EIS. Please contact Supervisory Park Ranger Bruce Malloy, our Air Space Coordinator, for any additional information at 915-828-3251, extension 134 or at the letterhead address.

Sincerely,


Larry Henderson
Superintendent

JOSEPH B MOORE, P.C.
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
220 WEST SEVENTH STREET, SUITE 206
AUSTIN, TEXAS 78701

PHILIP C. JOSEPH
SCOTT MOORE

POST OFFICE BOX 684186
AUSTIN, TEXAS 78768-4186
(512) 474-8812
FAX: (512) 478-6050

August 26, 1997

FEDERAL EXPRESS NO. 1306468811

U. S. Air Force Headquarters
Air Combat Command CEVA
129 Andrews Street
Langley AFB, VA 23669-2769

RE: Proposed Expansion of German Air Force Operations
at Holloman Air Force Base
Draft of the Environmental Impact Statement

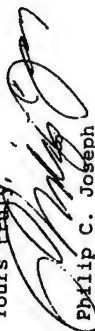
To Whom It May Concern:

I am recently in receipt of the draft of the Environmental Impact Statement dated June 1997 for the Proposed Expansion of the German Air Force Operations at Holloman AFB, New Mexico ("Statement"). I represent McCoy Land & Cattle Company and Emmett F. and Miriam M. McCoy who own and operate ranches in Pecos, Jeff Davis, and Reeves Counties, Texas. The McCoy ranches are in the area that is proposed for the Military Training Route - 102/141 by the expanded German Air Force operations out of Holloman Air Force Base in New Mexico described in the Statement. I request an extension of the period for comments, which expired on August 5, 1997, on behalf of McCoy Land & Cattle Company and Emmett F. and Miriam M. McCoy concerning the Statement. I was only recently made aware of the proposed over flights described in the Statement over the McCoy ranches, and it is anticipated that the over flights will have an adverse impact upon endangered species, ranching operations, wildlife, historical structures, hunting, and the value of the ranches. It will take time to review and analyze the Statement and prepare comments on the Statement. I request an extension of the comment period on the

U.S. Air Force Headquarters
August 26, 1997
Page 2

Statement so that the due date of comments will be
October 5, 1997.

Yours truly,



Philip C. Joseph

PCJ/lr

cc: Mr. Emmett F. McCoy
Mr. Kaare J. Renne

NEW MEXICO SPORTSMEN
3320 12th ST NM ALB., NM 87107
PH (505) 345-0117

SEPTEMBER 1, 1997

Tim Sanders
Caballo Resource Area Manager
Bureau of Land Management
1800 Marquess St.
Las Cruces, NM 88005

Re: HOLLMAN AFB PROPOSED BOMING RANGE & MAGREGER RANGE
WITHDRAWAL

Dear Mr. Sanders,

We are opposed to the use of the Otero Mesa area for the new booming range proposed by H.A.F.B.. Instead we support other alternatives such as Tularosa basin or expanded use of existing ranges. Public use and other values such as wildlife, grazing, etc. are much more appropriate for Otero Mesa than a new booming range. This area should not be sacrificed to military uses when there uses could be applied to other areas of lesser conflict with public interests. We further feel that the Mountain Footfill and Otero Mesa areas should be returned to non-withdrawal public land status. These areas should not be part of the McGregor Range Withdrawal when the current withdrawal expires in 2001.

Thank you for the opportunity to comment. Please make these comments part of the public record. Also, please add our organization to your mailing list for all future communications / documents pertinent to this issue.

Sincerely:

Larry Caudill
Representative for New Mexico Sportsmen
3320 12th ST NW
Alb. NM 87107
Ph: 345-0117 (after 5:00 PM)
Fax: (505) 343-9319 must call before sending
E-mail: oasim@flash.net



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Las Cruces District Office
1800 Maricopa
Las Cruces, New Mexico 88005

IN REPLY REFER TO:

1610 (1137MO)

AUG 24 1997

Ms. Sheryl Parker
U.S. Department of the Air Force
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley Air Force Base, VA 23665-2769

Dear Ms. Parker:

This letter is in response to the review of the Draft Environmental Impact Statement (DEIS) regarding the Proposed Expansion of German Air Force Operations at Holloman Air Force Base, New Mexico.

The Bureau of Land Management (BLM), Las Cruces District, has reviewed the DEIS and compiled comments for submission. In compliance with departmental procedures, the Department of the Interior, Office of Environmental Policy and Compliance (OEP/C) will be consolidating and submitting comments for all Interior Bureaus. This includes the comments of the BLM. The OEP/C continues for this project is Glen Sekaver: at (505) 766-3565.

If you have any questions, please call me or Tim Sanders at (505) 525-4300.

Sincerely,

Linda S. C. Kuehnel
Linda S. C. Kuehnel
District Manager



United States Department of the Interior

NATIONAL PARK SERVICE
Salinas Pueblo Missions National Monument
P.O. Box 517
Mountainair, New Mexico 87034-0517

IN REPLY REFER TO:

A3815

September 9, 1997

Ms. Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley Air Force Base, Virginia 23665-2769

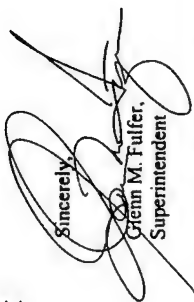
Dear Ms. Parker:

Thank you for providing us the opportunity to comment on the "Proposed Expansion of German Air Force Operations at Holloman Air Force Base, New Mexico". The National Park Service is strongly concerned about any expansion of use of Military Training Routes in central New Mexico which will have an adverse impact on the visitors to or the resources of Salinas Pueblo Missions National Monument.

Specifically, we are concerned about any alternative which will pose an expansion of use of Military Training Routes #IR-113, IR-133, VR-100/125, and VR 176 in central New Mexico. We are pleased that Candidate Target Locations #2 and #3 identified in Figure 2.1.8 of your study have been eliminated from further consideration. Use of these Candidate Target Locations might have increased the risk of undesirable noise impacts to Gran Quivira unit visitors and resources at Salinas Pueblo Missions National Monument.

The table on page 4-43 of your study suggests that expanded use of Military Training Routes in central New Mexico under the Existing Range Option would "...not (be) projected to adversely affect monument use". We subsequently observe, on pages 4-88, the statement "In the case of Salinas Pueblo Missions National Monument, aircraft are specifically required to avoid the units of the monument." We are pleased that the United States Air Force continues to recognize the fragility of Salinas Pueblo Missions National Monument cultural resources and that visitor appreciation of Monument resources can be adversely affected by intrusive noise from low-level aircraft flights.

Regardless of which alternative is ultimately selected, we respectfully request the continued cooperation of the United States Air Force in educating air crew members and pilots about the importance of avoiding direct overflights and sonic boom effects on Military Training Routes passing near Salinas Pueblo Missions National Monument units. If we can provide additional information or assistance in this regard, please contact me at your earliest convenience.

Sincerely,

Glenn M. Fulfer,
Superintendent

cc: David Simon, Southwest Regional Director, NPCA

SECTION 2.0

RESPONSES TO COMMENTS

Response to Written Comments
Received During the Public Comment Period
June 20 1997 to August 4, 1997

- W-1 Chapter 1 fully addresses the purpose and need of the proposed action.
- W-2 Chapter 1 addresses the purpose and need of the proposed action. The Memorandum of Agreement between the U.S. and Germany, which clarifies funding responsibilities for the proposed action, has been added to the EIS as Appendix A. The United States would pay for those elements of the proposed action, which directly benefit the U.S. Air Force. U.S. aircrew training, for example, would benefit from use of the new target complex (NTC); 40 percent of the costs of the NTC would be paid for by the U.S.
- W-3 The proposed action is under consideration. A decision has not been made as to whether to approve the proposed action or the no-action alternative.
- W-4 No environmental effects would be expected in the immediate vicinity of Roswell.
- W-5 If, following completion of the NEPA process, the proposed action were approved and authorized for implementation, construction would begin in 1998 and would be complete by August 2000. GAF personnel and aircraft would be in place by FY00. (See Chapter 2.)
- W-6 Chapter 1 fully addresses the purpose and need of the proposed action.
- W-7 In response to public comment, Sections 4.3 and 4.9 have been expanded to address this issue.
- W-8 Impacts to domestic animals and wildlife have been identified and are discussed in Section 4.5 and Appendix J. In response to public comment, additional information has been included in Appendix J on this subject. As discussed, in some circumstances, low-level aircraft flight may result in incidental livestock startle that may or may not lead to livestock damage.
- W-9 Impacts to aesthetic conditions are evaluated in Section 4.3.
- W-10 Big Bend National Park, Big Bend Ranch State Park, and Alpine, Texas, would not be overflowed under the proposed action. Although

there are no known studies on the effects of overflight on tourism, the National Park Service conducted a study on the effects of overflight on park visitation. This is discussed in Section 4.3.

- W-11 The Air Force has made every effort to make copies of the Draft EIS available to those who requested one. In addition, copies are available in public libraries throughout the area potentially affected by the proposed action.
- W-12 Impacts to infrastructure are addressed in Sections 4.9, 4.10, and 4.11.
- W-13 Sections 2.5 and 4.7 of the EIS have been expanded to reflect this information.
- W-14 Section 4.7 of the EIS has been expanded to reflect this information.
- W-15 New Mexico Water Quality Control Commission regulations would be complied with through NPDES permitting (see Section 2.5).
- W-16 Soil erosion at the LDT will be monitored and site runoff control practices will be employed to control erosion and abate non-point source pollution as required by DOD Directive 4700.4 (Natural Resources Management Program) and Air Force Instruction 32-7064 (Integrated Natural Resources Management).
- W-17 No significant impact on the Red Rio surface water quality would be expected under the proposed action (see Section 4.7). The Air Force will continue to monitor water quality at Red Canyon Springs. Section 3101 of the Toxic Substances Water Quality Act establishes the chronic standard for the use to be protected for various substances, but does not list TNT. Section 1102.F states that "for a toxic substance not listed in Section 3101," the provisions in Section 1103 shall be applied. Section 1103.D and F invoke EPA methodologies for establishing toxicity levels. The absence of an established New Mexico State water quality TNT toxicity level, coupled with the observed Red Rio TNT soil level of less than 0.5 ppm, indicate that TNT water toxicity should not be an impact of the proposed action. In the absence of a toxicity level or anticipated significant release, it is not reasonable or appropriate to establish precipitation runoff water control measures for TNT entering surface water at Red Rio.
- W-18 Sections 2.5 and 4.7 have been revised to clarify NPDES requirements.
- W-19 Section 4.8 has been revised to clarify that no new types of waste will be generated and will not require new storage capacity.

- W-20 Comment noted.
- W-21 These issues are considered in Chapter 4 of the EIS. In response to public comment, Section 4.9 has been expanded to include additional information on impacts on property values and business, including tourism and the filming industry.
- W-22 In response to public comments, data on noise levels at different side distances from the line of travel have been added to Sections 4.2 and 4.3.
- W-23 Aircrews are required by FAA and Air Force rules to stay within established route boundaries. Noise and other aircraft operations complaints can be reported through the Public Affairs Office at Holloman AFB (505-475-5406).
- W-24 In response to public comments, additional information on the noise aspects of the proposed action has been incorporated in Sections 3.2 and 4.2. The flight profiles provided in Table 2.1-8 present airspeeds and altitudes characteristic of operations in the affected airspace for the proposed action. The procedures and source terms used in the analyses are based on established scientific methods and analyses and the most appropriate data for the analyses involved in impact assessment.
- W-25 The flight profiles provided in Table 2.1-8 present airspeeds and altitudes characteristic of operations in the affected airspace for the proposed action. The procedures and source terms used in the analyses are based on established scientific methods and analyses, and the most appropriate data for the analyses involved in impact assessment.
- W-26 The EIS correctly states that all supersonic sorties conducted under the proposed action would be confined to the WSMR supersonic airspace. Supersonic flight is not permitted on MTRs. Violations of this restriction may be reported to the Public Affairs Office at Holloman AFB (505-475-5406).
- W-27 The procedures and source terms used in the noise analyses are based on established scientific methods and analyses, and the most appropriate data for the analyses involved. Section 3.2 has been expanded in response to public comments to further explain the use of day-night average sound level measurements. Additional noise impact evaluation results are given in Sections 4.2, 4.3, 4.5, and 4.9.

- W-28 Air Force personnel met with Otero County officials on eight occasions to discuss the proposed action, exchange information, and provide them with an opportunity to contribute to the process. Five copies of the Draft EIS were provided to Otero County Commission on June 20, 1997, the first day of the comment period.
- W-29 This EIS has been prepared in compliance with the National Environmental Policy Act. The NEPA process for an EIS requires that the public be provided with the opportunity to review and comment on Federal proposals. The Air Force welcomes specific comments on the Draft EIS.
- W-30 As Chapter 4 indicates, impacts in these areas would not be significant; no mitigation would be needed.
- W-31 Socioeconomic impacts of the proposed action are addressed in Section 4.9, which includes consideration of impacts to both the public and private sectors. No significant socioeconomic impacts were identified, and no mitigation is considered warranted.
- W-32 The analysis in Section 4.11 indicates an increase of 6 percent in demand on the city water and sewer systems. Given this small increase, and the fact that the existing facilities can handle the demand, a complete water and infrastructure study is not warranted.
- W-33 The purpose and need for the proposed action are fully described in Chapter 1 of the EIS.
- W-34 Complete information on using existing ranges is presented in this EIS. Current aircraft use of the existing ranges is described in detail in Chapters 2 and 3. Chapter 3 provides detailed information on existing non-military uses of portions of McGregor Range. The Chapter 4 analysis of the Existing Range training option provides detailed information on the environmental impacts associated with the use of existing ranges to support the proposed action.
- W-35 The McGregor Range plan is beyond the scope of this EIS.
- W-36 The list of preparers includes both social scientists and economists.
- W-37 Copies of the Draft EIS were provided to the Otero County Commission on 20 June 1997, the first day of the public comment period. S. Browning, Planning Coordinator, Otero County, is listed under personal communications. Ruth Hooser, County Manager, Otero County, was contacted and provided information for Table G.2.6-2.

- W-38 The proposed action (and accompanying analysis) is complex, and covers a large geographical area. In addition, the Air Force has given careful consideration to a wide variety of comments on the action obtained first through the public scoping process, and subsequently through the public hearings for the DEIS. Information and insights, as well as analysis of issues of concern to the public, have been added to this document in response to these comments. These factors have led to a complex analysis and presentation.
- W-39 The Air Force has made every effort to make copies of the Draft EIS available to those who requested one. In addition, copies are available in public libraries throughout the area potentially affected by the proposed action.
- W-40 In response to public comment, Section 3.3 has been expanded to include additional information.
- W-41 Effects of the proposed action on short and long-term uses are addressed in Section 5.2.
- W-42 The Air Force has made every effort to make copies of the Draft EIS available to those who requested one. In addition, copies are available in public libraries throughout the area potentially affected by the proposed action.
- W-43 The action under consideration is a proposed action. No decision has been reached as to whether or not to implement the proposed action, and any of the training options, or the no-action alternative. In addition to cost, environmental and operational considerations will also be presented to the decision-maker.
- W-44 In response to public comments, Section 4.3 has been expanded to further clarify impacts on grazing.
- W-45 Impacts to domestic animals and wildlife have been identified and are discussed in Section 4.5 and Appendix J. In response to public comment, additional information has been included in Appendix J on this subject. As discussed, in some circumstances, low-level aircraft flight may result in incidental livestock startle that may or may not lead to livestock damage.
- W-46 The forces exerted by noise from subsonic flight amount to a few ounces at most, and are considered insufficient to result in such damages. Aircraft turbulence from low-level overflight (also known as "wing-tip vortices") is a very localized phenomenon. The vortices

quickly abate with time and distance from the aircraft. With the FAA restrictions permitting overflight of structures to no closer than 500 feet, it is not anticipated that the low-level flights would cause damage in a properly constructed and maintained structure.

- W-47 In response to public comment, Section 4.9 has been expanded to address this issue.
- W-48 Air Force Regulations provide an established process through which damage claims can be submitted. Information on filing claims for damages can be obtained by contacting the Holloman AFB Public Affairs Office at 505-475-5406.
- W-49 Section 3.3 describes current uses, while Section 4.3 considers the effects of the proposed action on private and public categories of land ownership.
- W-50 Air Force personnel met with Otero County officials on eight occasions to discuss the proposed action, exchange information, and provide them with an opportunity to contribute to the process. Five copies of the Draft EIS were provided to the Otero County Commission on June 20, 1997, the first day of the comment period.
- W-51 Issues concerned with noise, wild game, and impact on human beings are extensively discussed in the document. See Sections 4.2, 4.3, 4.5, and 4.9.

With respect to "wave wash", aircraft turbulence from low-level overflight (also known as "wing-tip vortices") is a very localized phenomenon. The vortices quickly abate with time and distance from the aircraft. With the FAA restrictions permitting overflight of structures to no closer than 500 feet, it is not anticipated that the low-level flights would cause damage in a properly constructed and maintained structure.

With respect to the devaluation of property and personal property losses, in response to public comments, additional information has been included in Section 4.9 dealing with the potential impact of the proposed action on rural socioeconomic conditions and property values. Real property losses and economic losses can only be determined by review of the circumstances of each individual case.

- W-52 Air Force personnel met with Otero County officials on eight occasions to discuss the proposed action, exchange information, and provide them with an opportunity to contribute to the process. Five

copies of the Draft EIS were provided to the Otero County Commission on June 20, 1997, the first day of the comment period.

- W-53 In response to public comments, Section 4.5 has been expanded to explain how potential effects of the proposed action on whooping cranes would be addressed. Airspace use restrictions would be observed. The Air Force is continuing consultation with USFWS to ensure that the proposed action would not adversely affect whooping cranes.
- W-54 FAA regulations do not allow overflights within 500 feet of structures, including homes. Thus, 100-foot overflights of homes should not occur.
- W-55 Air Force Regulations provide an established process through which damage claims can be submitted. Information on filing claims for damages can be obtained by contacting the Holloman AFB Public Affairs Office at 505-475-5406.
- W-56 The discussion of the effect of noise on humans in Sections 4.2 and 4.3 has been expanded.
- W-57 Grama grass cactus populations are found in many locations in New Mexico. Sections 3.5 and 4.5 discuss this species. The species has been down-listed recently from the New Mexico listed species, because it is now considered to be common in the state.
- W-58 Air Force personnel met with Otero County officials on eight occasions to discuss the proposed action, exchange information, and provide them with an opportunity to contribute to the process. Five copies of the Draft EIS were provided to the Otero County Commission on June 20, 1997, the first day of the comment period.
- W-59 Additional information on historical use has been incorporated into Section 3.3.
- W-60 As discussed in Sections 3.8 and 4.8, given the close proximity of the proposed NTC site to testing areas, some potential exists for UXO to be present on site. While this potential is thought to be low, the Air Force would survey the area in order to ensure the safety of personnel working on the proposed NTC during construction and operation.
- W-61 Section 3.3 explains that access to McGregor Range is controlled by the Army and provides useful information based on best available data.

- W-62 Recreational uses of McGregor Range are described in Sections 3.3 and 4.3.
- W-63 The procedure used to calculate the noise levels and their impacts is based on established scientific methods and analysis. The land use analysis in Section 4.3 addresses effects on wilderness areas.
- W-64 In response to public comments, additional information has been included in Sections 3.3 and 4.3 on these subjects with respect to McGregor Range.
- W-65 In response to public comments, further information on this subject has been added to Section 4.5.
- W-66 The EIS does not imply that grass plants are nest sites for the aplomado falcon. The EIS indicates that falcons typically are associated with grassland habitat in the Chihuahuan Desert. Ligon (1961) identifies aplomado falcon habitat as open grassland with scattered mesquite and/or yucca. Additional information has been included in Table 3.5-4 and Section 4.5 to clarify this information.
- W-67 Ft. Bliss would have primary responsibility for the management of McGregor Range. However, day-to-day operations, and management of the NTC in general, would be the responsibility of the Air Force. The NTC would be managed in much the same manner as the existing Red Rio and Oscura impact areas. Section 2.1 of the EIS has been expanded to reflect this information.
- W-68 The current withdrawal of McGregor Range extends beyond FY00. Since the proposed action would be implemented in FY00, it is appropriate to use that date for describing baseline conditions against which impacts would be assessed.
- W-69 The term "West Otero Mesa training option" was selected to geographically describe the location of the proposed site. It should not be construed as implying a second range is being considered in the area. The Class C bombing range considered in the Ft. Bliss Master Plan published in 1993 is superseded by the proposed NTC considered under the proposed action. An additional range to support Holloman AFB flying requirements is not now being considered.
- W-70 Radar coverage is not required for the establishment of the proposed NTC.
- W-71 The statement in the EIS is accurate as written. BLM manages WSAs to preserve their wilderness qualities in accordance with the "Interim

Management Policy and Guidelines for Lands Under Wilderness Review."

- W-72 Radar coverage is not required for the establishment of the proposed NTC.
- W-73 The meaning of "footprint" is unclear. It apparently refers either to airport traffic patterns or to noise contours for Biggs Air Field. Neither extend into the area that would be affected by the NTCs under the Tularosa Basin or West Otero Mesa training options.
- W-74 The proposed action would be implemented in FY00. The analysis compares impacts against the conditions that would prevail at the time the proposed action would be implemented. The EIS also evaluates the cumulative effects of other actions that have recently occurred, or might occur in the reasonably foreseeable future. This is done by comparing conditions projected under the proposed action with those prevailing in FY00. The selection of baseline conditions provides an accurate assessment of both impacts that would be due to the proposed action, and its cumulative effects with other actions. This is in accord with both the spirit and letter of NEPA.
- W-75 Discussions in Sections 4.2 and 4.3 do not indicate that there would be any reason to close existing campgrounds.
- W-76 The noise analysis for the proposed action does not indicate changes in noise levels at any location under the affected airspace that are incompatible with existing land uses. This includes the area east of McGregor Range, and the area of Carrizozo, New Mexico.
- W-77 The proposed action does not involve a modification to existing airspace. All supersonic activity under the proposed action, no more than 24 sorties per year at altitudes above 10,000 feet MSL, would be confined to WSMR supersonic airspace, which is fully contained within WSMR restricted airspace.
- W-78 The Executive Summary and Section 4.3 accurately reflect the land use impact analysis. Section 3.3 addresses the roles of agencies in managing use of the area.
- W-79 Cleanup requirements are impact area-specific, and they vary. For example, at the Oscura impact area the targets are circular and there is a greater concentration of munitions on the targets. Consequently, these areas are cleaned up more frequently for safety reasons. Air Force directives require that the Red Rio impact area must be cleaned once a year. However, because of vegetation growth, the airfield

target portion of this area is cleaned twice per year. The NTC would be cleaned once a year unless vegetation growth makes two cleanings per year necessary.

- W-80 The Executive Summary accurately reflects the findings of the air quality impact analysis discussed in Sections 3.4 and 4.4. The closest activities to El Paso are sorties in McGregor Range that are at least 30 miles to the north. The exhaust from aircraft would tend to rapidly disperse due to local turbulence and rise due to the high temperatures.
- W-81 "Fear" is an anthropomorphic characterization that normally would not be used by an animal behavior biologist to describe the response of an animal to a stimulus. Biologists normally avoid such terms because they imply that an animal's response matches a human paradigm, rather than one unique to the species. The term "startle response" is commonly used to describe the behavior of animals (including human beings and wildlife) when exposed to sudden changes in environmental stimulus. It is used in particular to describe the response of animals to the sudden onset of noise events. To the extent that the concept of "fear" has any meaning in animal populations, it would be included in the term "startle response." The Air Force knows of no studies of the response of wildlife to noise that are described in terms of "fear response."
- W-82 In response to public comments, Sections 4.7 and 4.11 have been expanded to clarify these issues. Construction activities as discussed in Sections 2.5, 3.7, and 4.7 would be in accordance with CWA permitting.
- W-83 State Road 506 is closed occasionally due to existing activities on the Range. Implementation of either the Tularosa Basin or West Otero Mesa training option would not require periodic closure of this road, and would not affect traffic flow. State Road 506 is currently, and will continue to be, maintained by the County. In response to public comment, Section 3.10 and 4.10 have been expanded to include additional information on this subject.
- W-84 There are no plans at this time to widen U.S. 54 between Alamogordo and the New Mexico/Texas state line. According to the New Mexico Highway Department, the amount of traffic on this highway segment does not require the widening to 4 lanes.
- W-85 In response to public comments, Section 4.11 has been expanded to clarify these issues.

- W-86 As indicated in the EIS, the Bonito Pipeline has been repaired and is transporting water at levels above 90 percent of capacity to the city's reservoir. In response to public comment, Section 3.11 has been expanded to clarify this point.
- W-87 Deterioration in quality of groundwater withdrawals from Holloman wells has been noted in Sections 3.7 and 3.11 as a baseline condition.
- W-88 Increased use of inert munitions at existing ranges is considered to have negligible impact on soils. Changes in munitions usage in these areas are relatively slight.
- W-89 The text is correct as written. Soil is created through natural, mechanical, and biological processes.
- W-90 The text compares the rate of soil loss during decontamination versus operation, not the permanency of its loss. Appropriate erosion control measures would be used to minimize soil loss. Note that soil creation via natural process would also occur. The effects of decontamination would be mitigated by grooming and compacting most areas disturbed by decontamination.
- W-91 The sentence merely states that conclusions remain valid for both NTC training options and the Existing Range training option.
- W-92 The proposed action would be implemented in FY00. The analysis compares impacts against the conditions that would prevail at the time the proposed action would be implemented. The EIS also evaluates the cumulative effects of other actions that have recently occurred, or might occur in the reasonably foreseeable future. This is done by comparing conditions projected under the proposed action with those prevailing in FY00. The selection of baseline conditions provides an accurate assessment of both impacts that would be due to the proposed action, and its cumulative effects with other actions. This is in accord with both the spirit and letter of NEPA.
- W-93 The Air Force has reviewed impacts cited by the commenter and has taken these and other factors into consideration in the evaluation of the effects of implementation of the proposed action.
- W-94 The Air Force addresses specific mitigation measures where necessary.
- W-95 Sections 3.3 and 4.3 discuss hunting, and the associated access to McGregor Range for present and future conditions, respectively.

Impacts of the proposed action on wildlife are addressed in Section 4.5.

- W-96 Sections 3.3 and 4.3 discuss hunting, and the associated access to McGregor Range for present and future conditions, respectively. Impacts of the proposed action on wildlife are addressed in Section 4.5.
- W-97 Impacts on land use are addressed in Section 4.3.
- W-98 None of the training options considered under the proposed action would require or result in closure of State Road 506.
- W-99 The procedures and source terms used in the analyses are based on established scientific methods and analyses. The source terms used are the most appropriate data for the analyses involved. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Data specific to the Tornado aircraft are used where appropriate. Appendix D reviews studies on the effects of overflight on people. Appendix J provides additional information on the effects of overflight on livestock and wildlife for comparable altitudes and noise levels.
- W-100 The analysis of operations does not depend on the presence or absence of habitation. All supersonic activity under the proposed action, no more than 24 sorties per year at altitudes above 10,000 feet MSL, would be confined to WSMR supersonic airspace, which is fully contained within WSMR restricted airspace.
- W-101 Laser testing is not part of the proposed action and is outside of the scope of the EIS. Information on laser use associated with the proposed action has been included in Section 4.13.
- W-102 The EIS does not imply that grass plants are nest sites for the aplomado falcon. The EIS indicates that falcons typically are associated with grassland habitat in the Chihuahuan Desert. Ligon (1961) identifies aplomado falcon habitat as open grassland with scattered mesquite and/or yucca. Additional information has been incorporated in Sections 3.5 and 4.5 to clarify this point.
- W-103 This species is found in several springs upstream and outside the impact area of Holloman AFB involved in the proposed action.

Implementation of the proposed action would not result in any change in environmental conditions in this area. As a result, the species and its habitat would not be affected by the proposed action. Since the species would not be affected by the proposed action no mitigation measures would be required.

- W-104 Grama grass cactus populations are found in many locations in New Mexico, including Otero Mesa. Habitat exists for this species on the West Otero Mesa NTC site. No specimens of this species were found on the West Otero Mesa site during the 1997 field survey. Since only portions of the site were surveyed, it is possible that grama grass cactus is present on the site. However, the species has been recently down-listed from the New Mexico listed species, because it is now considered common in the state.
- W-105 "Mountain lion" or "cougar" are both correct common names for the species *Felis concolor*. "Mountain lion" is commonly used by the New Mexico Department of Game and Fish (NMDGF) and in other research reports.
- W-106 Based on discussion with the NMDGF, the area has only low potential use as a corridor by mountain lions since important prey items (e.g., mule deer) are primarily found north of State Road 506. Similarly, mountain lion harvest data show that no mountain lions have been taken from McGregor Range south of State Road 506.
- W-107 The screening analysis used to select potential locations for the NTC is presented in Chapter 2 of the EIS. The screening analysis considered a wide range of locations. Two of the locations considered were within the boundaries of WSMR; neither was found to meet the site selection criteria for the NTC. The Air Force is unaware of any other locations within the boundaries of WSMR that would meet the established site selection criteria.
- W-108 Fire response on the McGregor Range Complex is coordinated through and managed by the Fort Bliss Fire Department. Clarifying text has been added to the EIS (see Section 4.13).
- W-109 The proposed action does not require or include the acquisition of private property. Low-level flight is not expected to result in significant adverse impacts to the noise environment, as discussed in Section 4.2. All supersonic activity under the proposed action, no more than 24 sorties per year at altitudes above 10,000 feet MSL, would be confined to WSMR supersonic airspace, which is fully contained within WSMR restricted airspace. There would be no boom-and-bust cycle under the proposed action because construction

would be complete by the time operations personnel would move into the area (see Section 4.9). Real property losses and economic losses can only be determined by review of the circumstances of each individual case. The Air Force has committed to repairing any damage to the Otero Mesa water supply infrastructure due to NTC operations.

- W-110 In response to public comments, further information on this subject has been added to Section 4.5.
- W-111 Section 4.9 has been revised to include additional information and analysis of the economic effects of grazing operations. No grazing areas are impacted under the Tularosa Basin training option. As indicated in Section 3.3, grazing permits for McGregor Range were purchased by the Army in the 1950s. Given the level of economic impact from the proposed action as described in Section 4.9, replacement of the affected AUMs is not considered to be necessary.
- W-112 Section 4.3 has been expanded to address compatibility of aircraft operations with grazing and ranching operations. Additional noise analysis, using more precise techniques, has been applied to the assessment of the operation of the proposed NTC. Data from this analysis have been added to Section 4.2 to identify noise levels in the vicinity of McGregor Range. These data indicate that a maximum noise level of 62 dB (L_{dnmr}) would occur in areas beyond the McGregor Range boundaries, but within the area underlying R-5103 where private dwellings occur. These noise levels are considered compatible with residential use, and no relocation of residents would be required.
- W-113 Information on the response of domestic animals to low-level overflight is provided in Appendix J. Sections 3.3 and 4.3 have been expanded to address compatibility of aircraft operations with grazing and ranching operations. Property damage and associated economic losses can only be determined by review of the circumstances of the individual case.
- W-114 Air Force personnel met with Otero County officials on eight occasions to discuss the proposed action, exchange information, and provide them with an opportunity to contribute to the process. Five copies of the Draft EIS were provided to the Otero County Commission on June 20, 1997, the first day of the comment period.
- W-115 The proposed action (and accompanying analysis) is complex, and covers a large geographical area. In addition, the Air Force has given careful consideration to a wide variety of comments on the action

obtained first through the public scoping process, and subsequently through the public hearings for the DEIS. Information and insights, as well as analysis of issues of concern to the public have been added to this document in response to these comments. These factors have led to a complex analysis and presentation. It should be noted that the public comment period was for a duration of 45 days, from June 20th through August 4th, 1997.

- W-116 Socioeconomic impacts of the proposed action are addressed in Section 4.9, which includes consideration of impacts to both the public and private sectors. No significant socioeconomic impacts were identified, and no mitigation is considered warranted.
- W-117 Impacts for each resource are explicitly examined and presented in the EIS. In response to public comments, additional information on the impacts to grazing operations is provided in Section 4.9.
- W-118 Sections 3.13 and 4.13 of the EIS address mishap rates of Tornado aircraft.
- W-119 In both the United States and German Air Forces, all personnel are trained and fully qualified for the tasks they perform in supporting the operation and maintenance of their applicable aircraft.
- W-120 Safety practices and procedures applicable to ordnance use are discussed in Section 3.13 of the EIS.
- W-121 If U.S. law is violated by a member of the German forces, the violation would be addressed by that country determined to have jurisdiction in accordance with the NATO Status of Forces Agreement and bilateral arrangements between the United States and Germany.
- W-122 Some funds have been appropriated for environmental cleanup in portions of McGregor Range. No funds, however, have been appropriated for cleanup in the areas incorporating either the Tularosa Basin or West Otero Mesa sites.
- W-123 The forces exerted by noise from subsonic flight amount to a few ounces at most, and are considered insufficient to result in such damages. Aircraft turbulence from low-level overflight (also known as "wing-tip vortices") is a very localized phenomenon. The vortices quickly abate with time and distance from the aircraft. With the FAA restrictions permitting overflight of structures to no closer than 500 feet, it is not anticipated that the low-level flights would cause damage in a properly constructed and maintained structure.

- W-124 In response to public comment, Section 4.9 has been expanded to address the property value issue.
- W-125 Air Force personnel met with Otero County officials on eight occasions to discuss the proposed action, exchange information, and provide them with an opportunity to contribute to the process. Five copies of the Draft EIS were provided to the Otero County Commission on June 20, 1997, the first day of the comment period.
- W-126 Customs and culture issues are addressed in Section 4.3.
- W-127 As discussed in Section 4.3, these activities would continue on Otero Mesa under the proposed action.
- W-128 The proposed action would establish a safety area surrounding a central impact area. Access to the impact area would be precluded under the proposed action, and access to the safety area would be restricted. However, both the impact area and the surrounding safety area would be wholly contained within the existing boundaries of McGregor Range. No private property is contained within these boundaries. Access to private property beyond the boundaries of McGregor Range would be unaffected by implementation of the proposed action.
- W-129 The impact of the proposed action was found to be insignificant for some resources, and significant for others. See Chapter 2 for a summary of impacts. CEQ regulations provide a definition for significance that is based on the intensity (or severity) and the context, (or setting) of the impact. This definition was used in assessing whether an impact would be significant. It is also important to note that impacts of the proposal are assessed relative to baseline conditions. If the difference between conditions with and without the proposed action is small, the impact will usually be considered insignificant.
- W-130 Estimates of population growth and water requirements were developed based on historic consumption patterns in the City of Alamogordo and at Holloman AFB. Utility requirements for the proposed action were evaluated in addition to future requirements for the city. The capacity of the system was evaluated and the system operator indicated that no problems are anticipated in meeting the projected demand. Section 4.11 has been expanded to clarify this point.

- W-131 Weed and Mayhill are shown in Fig. 1-1. Pinon, Sacramento, and Hope have been added to Fig. 1-1.
- W-132 Environmental Justice is addressed in Sections 3.9 and 4.9.
- W-133 Discussion of mitigations has been added to the document where appropriate.
- W-134 Additional information on the effect of overflight on livestock and wildlife has been included in Appendix J. However, real property damage and associated economic losses can only be determined by review of the circumstances of the individual case. Air Force Regulations specify procedures that may be followed in regard to claims for damages made against the Air Force. Information on filing claims for damages can be obtained by contacting the Holloman AFB Public Affairs Office at 505-475-5406.
- W-135 If an NTC were to be constructed, the area would be regularly cleaned by the Air Force. Use of the NTC would not result in accumulation of ordnance debris that would prevent future public use. See Section 4.8.
- W-136 The purpose and need for this action are fully discussed in Chapter 1. The proposed action does not involve a lease arrangement with the GAF. See the Memorandum of Agreement in Appendix A.
- W-137 The proposed action does not involve the acquisition of private lands. The discussion of impacts to use of lands for grazing has been expanded in Section 4.3.
- W-138 The effect of the proposed action on socioeconomic conditions in the three-county region, including Holloman AFB and the surrounding communities, is examined in Section 4.9.
- W-139 Impacts to these areas are addressed in Section 4.3.
- W-140 Section 4.5 and Appendix J have been expanded to more fully treat these issues. The evaluation of impacts is based on best available information, which includes research results on the response of large mammals (including deer and bighorn sheep) and the spotted owl. The evaluated impact level is based on the relatively small increase in the number of daily sorties on airspace that has been used for years and the review of literature that indicates that impacts appear to be temporary, though the potential long-term impacts are unclear. There have been two short-term studies of response of Mexican spotted owls to aircraft overflights or noise. Overflights of owls in

Colorado resulted in minor responses. Studies of the effects of noise in the Sacramento Mountains, New Mexico, also indicate that owl responses are minor (see Appendix J).

- W-141 Impacts to domestic animals and wildlife have been identified and are discussed in Section 4.5 and Appendix J. In response to public comment, Section 4.5 and Appendix J have been expanded to include additional information on this subject.
- W-142 These areas would not be overflowed under the proposed action.
- W-143 Changes in airspace use in the west Texas area would be relatively modest, and would be broadly dispersed within the affected area. Any impact on film-making activities in the area may be minimized through adjustments in scheduling. Information on expected aircraft activity on specific routes on specific dates, can be obtained through the Public Affairs Office at Holloman AFB (505-475-5406).
- W-144 Section 4.3 has been expanded to address compatibility of aircraft operations with grazing and ranching operations.
- W-145 Maximum sound levels for aircraft in subsonic flight under the proposed action would exert at most, a force of a few ounces. These forces, even taken cumulatively, are insufficient to affect the structural integrity of a building. Aircraft turbulence from low-level overflight (also known as "wing-tip vortices") is a very localized phenomenon. The vortices quickly abate with time and distance from the aircraft. With the FAA restrictions permitting overflight of structures to no closer than 500 feet, it is not anticipated that the low-level flights would cause damage in a properly constructed and maintained structure. Appendix D discusses noise effects on structures, including windows.
- W-146 Most of the anticipated growth outside Otero County is expected to occur in the El Paso area. Therefore, in addition to the growth anticipated in Otero County, employment in El Paso is expected to increase by approximately 152 in the year 2000, with population increasing by 320. See Appendix G.
- W-147 The purpose and need for the proposed action are fully discussed in Chapter 1. While the training of the GAF aircrews would take place at Holloman AFB, the Tornado is not part of the U.S. inventory; the training would be conducted by GAF personnel. Further, as discussed in Chapter 1 of the EIS, it is in the best interest of the United States that military personnel from different U.S. ally nations achieve a uniformly high level of training and proficiency, thereby forging the

strongest possible team. This fosters combined action capabilities that permit military forces of many nations to work together to meet specific threats.

- W-148 This information is provided in Chapter 2 and Section 4.9.
- W-149 Most of the increases in income and employment would occur in Otero County. Maximum annual employment increase associated with the project in 2000 is projected to be 947, with increased population of 1,814. See Section 4.9.
- W-150 Most of the anticipated growth outside Otero County is expected to occur in the El Paso area. Therefore, in addition to the growth anticipated in Otero County, employment in El Paso is expected to increase by approximately 352 in the year 2000, with population increasing by 320. See Appendix G.
- W-151 Sections 3.2 and 4.2, plus Appendices D and J, discuss the various aspects of aircraft noise, its analysis, and its effects. The primary impact from low aircraft noise is annoyance. The maximum noise levels are within the guidelines established by the U.S. Environmental Protection Agency. Noise levels would be well below the threshold of any risk to hearing or human health. Appendix D discusses the vibration aspects of noise. Aircraft turbulence from low-level overflight (also known as "wing-tip vortices") is a very localized phenomenon. The vortices quickly abate with time and distance from the aircraft.
- W-152 Information on studies that have been conducted in these areas are provided in Sections 4.3, 4.5, 4.9, and 4.10, as well as Appendices G and J.
- W-153 Sections 3.2 and 4.2, plus Appendices D and J, discuss the various aspects of aircraft noise, its analysis, and its effects. This text has been expanded to more clearly explain the effect of flight noise on animals and humans.
- W-154 Bighorn sheep populations are identified in Section 3.5 and impacts of overflights to big game are discussed in Section 4.5 and Appendix J. Table 3.5-1 has been modified to specify the Fra Cristobal Mountain population.
- W-155 Per discussions with the U.S. Fish and Wildlife Service, the release of the California Condor in the Fra Cristobal Mountains is not a reasonably foreseeable action.

- W-156 The EIS identifies this colony in Section 4.3. Potential impacts from overflights are discussed in Section 4.5.
- W-157 The EIS has been modified to identify this population. There are and would be no night sorties on VR-176. Therefore, impacts to bats entering and leaving the cave would be negligible.
- W-158 Potential impact to the aplomado falcon is presented in Section 4.5. The Air Force has determined that the effects would not likely adversely affect the aplomado falcon. The basis for both positions is provided in the FEIS. The Air Force is currently continuing consulting with U.S. Fish and Wildlife Service (Section 7 of the Endangered Species Act) to ensure that impacts to the aplomado falcon and other protected species are minimized.
- W-159 Impacts to domestic animals and wildlife have been identified and are discussed in Section 4.5 and Appendix J. In response to public comment, additional information on this subject has been included in Appendix J.
- W-160 As indicated in Section 3.1 of the EIS, military flights can be compatible with civil aviation activities when all pilots adhere to Federal Aviation Regulation Part 91, see-and-avoid flight practices.
- W-161 The probability of such an occurrence is considered extremely unlikely.
- W-162 Property damage and associated economic losses can only be determined by review of the circumstances of the individual case. Noise and other aircraft operations complaints can be reported through the Public Affairs Office at Holloman AFB (505-475-5406).
- W-163 The proposed action would be in compliance with all applicable laws and regulations, including FAA regulations concerning low-level flying.
- W-164 Section 4.3 has been expanded to address compatibility of aircraft operations with grazing and ranching operations. Property damage and associated economic losses can only be determined by review of the circumstances of the individual case. Noise and other aircraft operations complaints can be reported through the Public Affairs Office at Holloman AFB (505-475-5406).
- W-165 Section 4.5 and Appendix J identify potential impacts to biological resources. Section 4.9 identifies potential impacts to socioeconomic conditions.

- W-166 The potential effects of noise-induced vibration from subsonic overflights are discussed in Section 4.6 and Appendix D
- W-167 Comment noted. The EIS provides a balanced assessment of the impacts of the proposed action and alternatives.
- W-168 The analysis identifies effects to residential and recreational use. There are no data addressing the effects of military overflight on tourism and the retirement industries. Although there are no known studies on the effects of overflight on tourism, the National Park Service conducted a study on the effects of overflight on park visitation. This is discussed in Section 4.3.
- W-169 The proposed action does not include the establishment of new airspace. The action would make use of existing airspace approved by the FAA.
- W-170 It is sometimes stated that 55 dB (L_{dn}) should be adopted as a criterion for community noise analysis simply because the EPA identified this noise level as "...requisite to protect public health and welfare with an adequate margin of safety". However, most agencies have identified an L_{dn} of 65 dB as a criterion which protects those most impacted by noise, and which can often be achieved on a practical basis (FICON, 1992). Under the proposed action, day-night averaged noise levels would not exceed 65 dB on any of the affected MTRs, MOAs or Restricted Areas where there would be public exposure to elevated noise levels.
- W-171 The dose response curve (the "Schultz curve"), presented in Appendix D of the EIS, relates the level of community annoyance to cumulative noise exposure and has been reaffirmed by the Federal Interagency Committee on Noise (FICON, 1992) as the best available measure of response to aircraft noise. In addition, a study (Stusnick, Eric, and Kevin Bradley, October 1992. "The Effects of Onset Rates on Aircraft Noise Annoyance." Vol. II: *Rented Home Experiments*. Tech. Report AL/OE-TR-1993-0170) has shown that the response of rural residents in rural settings to noise from low-flying, high-speed, military aircraft is predicted by the same dose response curve.
- W-172 Air Force personnel met with Otero County officials on eight occasions to discuss the proposed action, exchange information, and provide them with an opportunity to contribute to the process. Five copies of the Draft EIS were provided to the Otero County Commission on June 20, 1997, the first day of the comment period.

W-173 The proposed action does not include the establishment of new airspace. The action would make use of existing airspace previously approved by the FAA.

W-174 As part of the EIS process, the impact of the noise related aspects of the proposed action were evaluated. Sections 3.2 and 3.3 as well as Appendix J, describe the noise aspects, and Sections 4.2, 4.3, 4.5, 4.6, and 4.9 present impact analysis results. The proposed action does not include the establishment of new airspace. The action would make use of some airspace for which FAA approval is pending.

W-175 Chapter 3 provides data on baseline conditions against which impacts would be evaluated. The comparison that the comment focuses on examines the differences between conditions prevailing in FY95 with those that would prevail in FY00 immediately prior to implementation of the proposed action. The rationale for the projected FY00 baseline is presented in the introduction of Chapter 3. Changes in noise levels due to the proposed action are presented in Section 4.2. (It should be noted that information is also provided concerning the impacts of aircraft activity in the affected area by comparing the noise levels under the proposed action with those that prevailed in FY95.)

A 3 dB increase is equivalent to a doubling of sound pressure level. A 10 dB increase is equivalent to a doubling in perceived loudness (See Figure D-1). For the NTC, noise levels for 75 of the 91 points would increase by 3 dB or less over the FY00 baseline. The highest increase in noise would be 7 dB, a level which would be perceptible, but which is not considered significant. At some locations, the increase in the noise level would be perceptible but for a majority of the reference points there would be no perceived change in noise level.

W-176 Section 3.7 has been revised to address this point.

W-177 Section 3.7 has been revised to reflect current groundwater supply and use conditions for the area.

W-178 State Road 506 is closed occasionally due to existing activities on the range. Implementation of either the Tularosa Basin or West Otero Mesa training option would not require closure of this road, and would not affect traffic flow. The proposed NTC would not be manned, and no substantive increase in road traffic would be expected. State Road 506 is currently, and will continue to be, maintained by the County. In response to public comment, Section

3.10 and 4.10 have been expanded to include additional information on this subject.

- W-179 The site selection process is described in Section 2.1. It should be noted that the proposed locations for the NTC that are being considered are within the existing boundaries of McGregor Range. Purpose and need for the proposed action are fully discussed in Chapter 1 of the EIS.
- W-180 The dose response curve (the "Schultz curve"), presented in Appendix D of the EIS, relates the level of community annoyance to cumulative noise exposure and has been reaffirmed by the Federal Interagency Committee on Noise (FICON, 1992) as the best available measure of response to aircraft noise. In addition, a study (Stusnick and Bradley, 1992) has shown that the response of rural residents in rural settings to noise from low-flying, high-speed, military aircraft is predicted by the same dose response curve.
- W-181 Air Force Regulations specify procedures that may be followed in regard to claims for damages made against the Air Force. Specific incidents may be reported to the Public Affairs Office at Holloman AFB (505-475-5406). When reporting an incident, the time and place of the incident should be provided. In many cases, this information is all that would be necessary to identify the source of the incident. Information such as type of aircraft, tail-numbers, and insignia are often helpful in identifying the cause of a specific incident, but not necessarily essential.
- W-182 Research has shown that there is a significant change in annoyance due to noise after 10:00 pm. This is reflected in noise modeling which imposes a "penalty" on aircraft noise for sorties conducted after 10:00 pm. Sorties are assigned to day or night, depending on whether they occur before or after 10:00 pm, in order to accommodate modeling requirements.
- W-183 The list of Abbreviations and Acronyms at the beginning of the EIS is provided to simplify reading and reduce the overall length of the document.
- W-184 The figure schematically shows where noise calculations were provided in relationship to affected airspace, and major geographic locators. Given the complexity of the information being conveyed in these figures, providing further geographic detail would render the map unreadable. To help overcome this limitation Table 3.2-3 was provided in the DEIS. This table provides latitude and longitude coordinates for each reference point, as well as providing a text

description of the location of each reference point. Many of the noise calculations were made at points where changes in airspace configuration or aircraft operation suggest that changes in sound levels would result (points 1 to 44). Other noise calculations were made at specific points of interest for specific impact analyses (points 45 to 91).

- W-185 The footnote is intended to show areas where there are few operations and, as a result, the model is unable to accurately predict low noise levels. The explanation for this uncertainty is found in Section 4.2.
- W-186 Figures 2.1-15, 3.3-3, and 3.3-4 show the location and widths of the MTR corridors.
- W-187 Elephant Butte and Caballo reservoirs are under VR-176, which is used for low-level training by military aircraft. Analysis in the EIS indicates that there would be no perceptible change in noise levels in these areas due to the proposed action. See Section 4.5.
- W-188 Both reservoirs are part of the Rio Grande River system, which is discussed in Section 3.5 and 4.5. Bird-aircraft strike considerations are addressed in Sections 4.5 and 4.13.
- W-189 Cumulative impacts are examined in Chapter 5 for each resource.
- W-190 The proposed action is extensively described in Chapter 2. The purpose and need for the proposed action are presented in Chapter 1.
- W-191 Sections 4.2, 4.3, and 4.9 as well as Appendix J, have been expanded to provide additional information on the possible health effects of aircraft noise.
- W-192 The EIS contains additional information on impacts to residents east of McGregor Range (see Sections 4.2 and 4.3). Additional noise analysis, using more precise techniques, has been applied to the assessment of the operation of the proposed NTC. Data from this analysis have been added to Section 4.2 to identify noise levels in the vicinity of McGregor Range. These data indicate that a maximum noise level of 62 dB (L_{dn}) would occur in areas beyond the McGregor Range boundaries, but within the area underlying R-5103 where private dwellings occur. These noise levels are considered compatible with residential use, and no relocation of residents would be required. However, real property losses and economic losses can only be determined by review of the circumstances of each individual case and cannot be generalized into an overall impact.

- W-193 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions.
- W-194 Actions considered for cumulative effects analysis are itemized in Section 2.3. Cumulative effects are examined in the EIS for each resource in Chapter 5.
- W-195 Chapter 2 indicates airspace where chaff would be used under the proposed action and provides graphical descriptions of the airspace affected by the proposed action.
- W-196 The EIS correctly states that chaff decomposes through physical and chemical action. The EIS does not state "through biological action."
- W-197 The findings in this EIS are based on the amount of chaff used (see Table 2.1-11 for location of use) and a recent Air Force report (U.S. Air Force, 1997d. *Environmental Effects of Self-Protection Chaff and Flares*. Air Combat Command, Langley Air Force Base, Virginia) on the impacts of chaff. Additional information has been provided in Section 4.5 to address this issue.
- W-198 Additional information has been incorporated in Section 4.13 on chaff and flares.
- W-199 The use of 2.75 inch white phosphorous would not change under the proposed action (see Table 2.1-11).
- W-200 In response to public comment, additional information has been incorporated in Sections 3.13 and 4.13 to address these issues.
- W-201 Information on laser use associated with the proposed action has been included in Section 4.13.
- W-202 The Memorandum of Agreement between the U.S. and Germany, which clarifies funding responsibilities for the proposed action, has been added to the EIS as Appendix A. The United States would pay for those elements of the proposed action that directly benefit the U.S. Air Force. U.S. aircrew training, for example, would benefit from use of the NTC; 40 percent of the costs of the NTC would be paid for by the U.S.

- W-203 The public comment period ended August 4, 1997. However, all comments received by August 30, 1997, which are relevant to the proposed action, have been taken into consideration in the EIS.
- W-204 Section 4.3 has been expanded to address compatibility of aircraft operations with grazing. Section 4.2 has been expanded to provide a discussion of the effect of noise on human health. The proposed action does not involve supersonic flight over De Baca County.
- W-205 It should be noted that the public comment period was for a duration of 45 days, from June 20 through August 4, 1997. Although the public comment period ended August 4, 1997, all comments received by August 30, 1997, which are relevant to the proposed action, have been taken into consideration in the EIS.
- W-206 It should be noted that the public comment period was for a duration of 45 days, from June 20 through August 4, 1997. Although the public comment period ended August 4, 1997, all comments received by August 30, 1997, which are relevant to the proposed action, have been taken into consideration in the EIS.
- W-207 Comment noted.
- W-208 The Memorandum of Agreement between the U.S. and Germany, which clarifies funding responsibilities for the proposed action, has been added to the EIS as Appendix A.
- W-209 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions.
- W-210 The analysis considers both the effects of the proposed action by itself and in concert (cumulative effects) with other actions. The cumulative effects analysis considers both actions that are presently approved, but not yet implemented, and those that are under consideration, and might be implemented by FY00.
- W-211 Sections 3.5 and 4.5 disclose the general location of Waters of the U.S., species within the region of influence, and linear feet of Waters of the U.S. that may be affected.

- W-212 Locations other than Holloman AFB do not fulfill the purpose or address the needs described in Chapter 1.
- W-213 Comment noted.
- W-214 The EIS identifies other actions and associated NEPA analysis that have been implemented in the recent past that have bearing on the proposed action.
- W-215 Section 2.3 has been expanded to provide additional information on other activities in the region of influence. Cumulative impacts for each resource are addressed in Chapter 5.
- W-216 The use of the FY00 baseline is discussed in Chapter 2. See also the introduction to Chapter 3.
- W-217 Section 4.3 has been expanded to address compatibility of aircraft operations with grazing. Section 4.2 has been expanded to provide a discussion of the effect of noise on human health. Note that Section 3.2 has been expanded in response to public comments to further explain the use of day-night average sound level measurements.
- W-218 These are personal responses that cannot be accurately predicted. Providing comments on the Draft EIS ensures that community views and personal feelings are included in the NEPA documentation that will be made available to the decision maker.
- W-219 Transcripts are included in Volume II of the EIS.
- W-220 Section 4.4 has been expanded to include the effects of aerial "buddy-buddy" refueling operations.
- W-221 Section 2.3 describes actions considered for cumulative effects analysis. Additional information has been incorporated concerning non-military projects in the area.
- W-222 The procedure used to calculate the noise levels and their impacts is based on established scientific methods and analysis. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Section 4.2 of the EIS details the noise modeling approach, the reliability of the noise predictions, and the accuracy of the noise predictions. The noise effects analysis for land

use is given in Section 4.3. The effects on biological resources are given in Section 4.5. Chapter 5 presents the cumulative noise effects analysis.

- W-223 Section 4.2 has been expanded to include a discussion of the available research on the effects of aircraft noise on mental health. See also Appendix D.
- W-224 The Air Force is consulting with the Fish and Wildlife Service regarding this project and potential impacts to protected species. The EIS includes a discussion of the potential use of the Fra Cristobal Mountains as a release site for the California condor.
- W-225 Impacts to wilderness areas addressed in Section 4.3 have been expanded to address Bosque del Apache.
- W-226 At this time, the Air Force does not foresee the need for any additional German Air Force expansion at Holloman AFB nor are we aware of plans for any such expansion. Consequently, we cannot assess the potential environmental impacts that may be associated with any possible future expansion. Any future proposals would be analyzed in accordance with NEPA and other applicable laws.
- W-227 Text has been revised in Section 4.3 to include effects to Wilderness Areas and Wilderness Study Areas.
- W-228 Although MAILS modeling was not performed for each Class I airshed, the modeling results presented in Table 4.4-7 for the reasonable practical scenario indicated that impacts to PSD Class I areas would be insignificant. The MAILS model analysis includes other military aircraft activity through use of the FY00 baseline.
- W-229 The emission factors used to estimate aircraft emissions are a compilation of the best available emissions data for military aircraft operations and have been approved by the U.S. EPA.
- W-230 The Air Force uses Bird Aircraft Strike Hazard and Bird Avoidance Model programs to identify areas where there is an increased risk for bird strikes to minimize and avoid adverse impacts. Once consultations with the USFWS are complete, mitigations will be implemented as appropriate.
- W-231 The procedure used to calculate the noise levels and their impacts is based on established scientific methods and analysis. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included

representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Section 4.2 of the EIS details the noise modeling approach, the reliability of the noise predictions, and the accuracy of the noise predictions. The noise effects analysis for land use is given in Section 4.3. The effects on biological resources are given in Section 4.5. Chapter 5 presents the cumulative noise effects analysis.

- W-232 The Section 5.2 discussion of irreversible and irretrievable commitment of resources, as required under CEQ regulations, is specific to those adverse environmental effects which cannot be avoided should the proposed action be implemented.
- W-233 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present and reasonably foreseeable future actions.
- W-234 The EIS evaluates the full range of studies, including the *Proceedings of the Southwest Raptor Management Symposium and Workshop* paper on the response of animals to low-level, fixed-wing, military aircraft overflights in Appendix J. The EIS states that animal responses vary and that negative response may be associated with jet aircraft overflights.
- W-235 In response to public comment, additional information on this subject has been incorporated in the EIS. See Sections 3.5 and 4.5.
- W-236 The potential effects of noise-induced vibration from overflights are discussed in Section 4.6 and Appendix D.
- W-237 Comment noted.
- W-238 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions.

- W-239 Nuclear materials and missiles would not be carried by GAF aircraft. Chapter 2 describes the munitions that would be carried by the aircraft involved in the proposed action.
- W-240 Munitions use is provided in Chapter 2. Section 4.13 discusses the potential for aircraft mishaps. Section 3.13 discusses the safeguard procedures employed by the Air Force that are designed to prevent accidental release of munitions.
- W-241 The procedure used to calculate the noise levels and their impacts is based on established scientific methods and analysis. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Sections 3.2 and 4.2, and Appendix J of the EIS details the noise modeling approach, the reliability of the noise predictions, and the accuracy of the noise predictions.
- W-242 Impacts to domestic animals and wildlife have been identified and are discussed in Section 4.5 and Appendix J. In response to public comment, additional information has been included in Appendix J on this subject. As discussed in Appendix D, there are many scientific noise studies on the effect of noise on wildlife. The limitations of these studies, however, are such that criteria comparable to human health criteria are difficult to develop. The National Research Council has therefore proposed that the criteria used to protect the health of humans should be adequate to protect wildlife.
- W-243 In response to public comment, additional information on this subject has been incorporated in the EIS. See Section 4.5 and Appendix J.
- W-244 The NOI was published May 8, 1996. This information has been added to the EIS.
- W-245 The purpose and need for this action are fully discussed in Chapter 1. The U.S. is not contributing \$40 million to this project. The U.S. would pay 40 percent of the cost of the NTC. This would be approximately \$1.2 million for the West Otero Mesa training option or \$8 million for the Tularosa Basin training option. The basis for U.S. funding a portion of the proposed NTC is found in the Memorandum of Agreement which is provided in Appendix A.

- W-246 Section 3.6 discusses known archaeological, cultural, and historic resources without regard to ownership.
- W-247 As stated in Section 3.13, flares are released at altitudes that ensure, with a significant margin of safety, that no burning material reaches the ground.
- W-248 All supersonic activity under the proposed action, no more than 24 sorties per year at altitudes above 10,000 feet MSL, would be confined to WSMR supersonic airspace, which is fully contained within WSMR restricted airspace.
- W-249 Use of VR-1198/1197 would not be affected by the proposed action. Air Force Regulations specify procedures that may be followed in regard to claims for damages made against the Air Force. Specific incidents may be reported to the Public Affairs Office at Holloman AFB (505-475-5406). When reporting an incident, the time and place of the incident should be provided. In many cases, this information is all that would be necessary to identify the source of the incident. Information such as type of aircraft, tail-numbers, and insignia are often helpful in identifying the cause of a specific incident, but not necessarily essential.
- W-250 An air-to-ground range requires the use of restricted airspace that prevents operations by nonparticipating aircraft while the range is in use. Aviation activities around an airport require controlled airspace to sequence commercial and civil air traffic into and around the airport. These two types of airspace (controlled airspace and restricted airspace) are incompatible with each other. Under the proposed action, use of the NTC would require the existence of restricted airspace measuring at least 19 by 21 nautical miles. Such airspace does not now exist at Ft. Sumner Municipal airport, and could not be established there for the above stated reasons.
- W-251 As discussed in Chapter 2, the NTC requires MTR access in order to support aircrew training requirements. The area east/NE/SE of Roswell lacks such existing access. As a result, this area was not considered suitable as a location for the NTC.
- W-252 Terrain criteria used in the screening analysis were established to meet a variety of requirements, one of which is to ensure a margin of safety for aircrews. While combat conditions may require operation in a variety of terrain, placing aircrews at risk by the selection of severe terrain environments for routine training is considered unnecessary to meet the purpose and need of the proposed action.

- W-253 Comment noted.
- W-254 In response to public comment, Sections 4.3 and 4.9 have been expanded to provide additional information on potential impacts to land use and regional socioeconomics. Overall, regional socioeconomic impacts would not be significant. Air Force Regulations specify procedures that may be followed in regard to claims for damages made against the Air Force. Specific incidents may be reported to the Public Affairs Office at Holloman AFB (505-475-5406). When reporting an incident, the time and place of the incident should be provided. In many cases, this information is all that would be necessary to identify the source of the incident. Information such as type of aircraft, tail-numbers, and insignia are often helpful in identifying the cause of a specific incident, but not necessarily essential.
- W-255 Section 3.3, Land Use, addresses the fact that land is owned and managed by a variety of entities, including private owners.
- W-256 Executive Order 12898 requires consideration of Environmental Justice, as discussed in Section 3.9 of the EIS.
- W-257 The procedure used to calculate the noise levels and their impacts is based on established scientific methods and analysis. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Section 4.2 of the EIS details the noise modeling approach, the reliability of the noise predictions, and the accuracy of the noise predictions.
- W-258 The figure in question (Fig. C-1 in the Draft EIS) is intended to provide context for various noises encountered in the everyday environment. The maximum noise levels resulting from a direct overhead flight are listed in Table 4.2-1 and are directly comparable to the noise levels shown in Figure C-1.
- W-259 Comment noted.
- W-260 The Air Force is consulting with the Fish and Wildlife Service regarding this project and potential impacts to protected species. Specific locations of Waters of the U.S. are available in the document referenced in Chapter 3. The specific location of targets and roads within an NTC will not be known until immediately prior to

construction. At that time, the Air Force would complete any additional consultations needed to reduce the impacts that have been identified in this EIS (i.e., loss of up to 46,000 linear feet of Waters of the U.S.).

- W-261 The text of the EIS has been expanded to list a range of mitigations, some of which have been proposed to USFWS.
- W-262 The formal consultation process under Section 7 is required by the Endangered Species Act, not by NEPA, and does not provide for public review and comment. The Air Force initiated formal consultation with USFWS on November 24, 1997. Consultations with the USFWS are ongoing. When consultations are complete, appropriate mitigations will be implemented.
- W-263 The EIS summarizes the most recently available information on the known Waters of the U.S. Reasonably foreseeable significant adverse effects on the human environment to Waters of the U.S. and wetlands are addressed in Section 4.5. In addition, Section 404 permits would be required for any disturbance of a wetland area or Waters of the U.S. Compliance with the terms of the permit would ensure that reasonably foreseeable significant adverse circumstances will be avoided.
- W-264 The EIS addresses the general impacts that would result from road improvement activities, UXO removal, and from construction of the targets and the firebreak road. Designs would be completed following completion of the environmental process. The West Otero Mesa site encompasses 5,120 acres of land. It is estimated that construction of the target arrays would disturb 20 percent of this site. The EIS assumes that while anything within the 5,120-acre area could potentially be affected by construction, no more than 20 percent of the area would actually be disturbed. For the Tularosa Basin site, the entire 5,120-acre area would be disturbed during UXO removal.
- W-265 Implementation of the preferred training option (West Otero Mesa NTC) would disturb an estimated 1,104 acres, not eight square miles. The discussion of access to the mesa has been expanded in Section 4.3.
- W-266 Additional information and assessment of effects on hunting on Otero Mesa have been included in Section 4.3.
- W-267 This reference was deleted.
- W-268 Discussion of mitigations has been added to the document where appropriate.

- W-269 The compatibility criteria of Phase II screening (Section 2.1) defines mission conflicts.
- W-270 The screening analysis used to select potential locations for the NTC is presented in Chapter 2 of the EIS. The screening analysis considered a wide range of locations. Two of the locations considered were within the boundaries of WSMR; neither was found to meet the site selection criteria for the NTC. The Air Force is unaware of any other locations within the boundaries of WSMR that would meet the established site selection criteria.
- W-271 Locations other than Holloman AFB do not fulfill the purpose or address the needs described in Chapter 1.
- W-272 The Memorandum of Agreement is found in Appendix A.
- W-273 All supersonic activity under the proposed action, no more than 24 sorties per year at altitudes above 10,000 feet MSL, would be confined to WSMR supersonic airspace, which is fully contained within WSMR restricted airspace. The Elephant Butte and Caballo dams are more than 10 miles from the boundary of the WSMR supersonic airspace. At this distance, the force from sonic booms from aircraft under the proposed action would not be sufficient to cause damage to these structures.
- W-274 The use of existing ranges to support the proposed action is discussed under the Existing Range training option (see Chapter 2).
- W-275 Figures 3.3-3, 3.3-4, and 3.3-5 have been revised to identify the location of relevant national parks and monuments more clearly.
- W-276 Chapter 2 provides data on both baseline and proposed action sorties for all affected airspace. Taken together, these data provide information on cumulative sortie rates. Gran Quivira lies within the corridors of several MTRs, including VR-100/125, VR-176, IR-113, and IR-133. In FY95 this general area received 16 sorties per day as an annual average. This would increase to 20 sorties per day under the preferred option, an increase of about 25 percent. However, aircrews using VR-100/125, IR-113, and IR-133 must avoid Gran Quivira by three nautical miles. This would remain unchanged under the proposed action, and no change in overflight would be expected. Presently, the avoidance area about Gran Quivira for VR-176 is 0.5 nautical mile. The Air Force is in the process of increasing this to three nautical miles.

- W-277 Cumulative effects of the proposed action for each resource are explicitly examined in Chapter 5 of the EIS.
- W-278 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions.
- W-279 Because the precise locations of other activities that may occur in the region have not been identified, firm estimates of the cumulative effects on cultural resources are difficult to make. However, general estimates can be made based on general knowledge of the cultural resources in the region. The cumulative impacts from use of MTRs are included in the analysis of the proposed action.
- W-280 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions.
- W-281 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions. The Air Force is sensitive to the need for mitigation of significant adverse impacts. The Air Force will work with DOI personnel to develop any necessary mitigation measures. Such measures as agreed upon would be included in the Record of Decision.
- W-282 Impacts to domestic animals and wildlife have been identified and are discussed in Section 4.5 and Appendix J. In response to public comment, additional information on this subject has been included in Appendix J. As discussed, in some circumstances, low-level aircraft flight may result in incidental livestock startle that may or may not lead to livestock damage.

- W-283 The EIS has been revised to resolve the apparent contradiction. The proposed target complex, either at the West Otero Mesa site, or at the Tularosa Basin site, would encompass 5,120 acres. Under the Tularosa Basin training option, this entire area would be disturbed. Under the West Otero Mesa training option, the entire area would be subject to disturbance, but only 20 percent of the site would actually be disturbed.
- W-284 The Air Force is consulting with Ft. Bliss personnel to address this issue.
- W-285 Deposition of airborne pollutants associated with aircraft emissions would not result in contamination of groundwater resources. Most aircraft emissions are gaseous in form and would not settle to the ground. It is conceivable that particulate emission could partially settle to the ground. However, atmospheric processes disperse these emissions so broadly that no significant deposition would be expected. In the absence of significant changes in air quality in general, and in ground deposition of particulate matter in particular, aircraft emissions would not be expected to result in any significant impact to groundwater.
- W-286 Section 4.1 addresses airspace use. Section 4.13 addresses safety issues. In general, implementation of the proposed action would not adversely affect the ability of U.S. aircrews to make use of the affected airspace, nor would it result in a significant impact on air safety.
- W-287 As discussed in Section 4.7, implementation of the proposed action would result in negligible effect on surface water quality; no effect on fish populations would therefore be anticipated.
- W-288 The effect on the national fuel supply would be so small relative to the total market that there was no need to examine this issue in the EIS.
- W-289 UXO refers to unexploded ordnance. UXO from past operations is known to be present on the Tularosa Basin site. If the Tularosa Basin training option was implemented, the site would be decontaminated prior to construction. It is possible, but highly unlikely, that the West Otero Mesa site is also contaminated by UXO. If the West Otero Mesa training option was implemented, any UXO discovered during construction would be removed as well.
- W-290 The proposed action does not involve the establishment of new airspace. As indicated in Section 3.1 of the EIS, military flights can be

compatible with civil aviation activities when all pilots adhere to Federal Aviation Regulation Part 91, see-and-avoid flight practices.

- W-291 The Memorandum of Agreement between the U.S. and Germany, which clarifies funding responsibilities for the proposed action, has been added to the EIS as Appendix A. The United States would pay for those elements of the proposed action that directly benefit the U.S. Air Force. U.S. aircrew training, for example, would benefit from use of the NTC; 40 percent of the costs of the NTC would be paid for by the U.S.
- W-292 The airspace structure of the MTRs is provided in Table 3.1-1 of the EIS. Additional airspace information is provided in Sections 2.1 and 3.1. Section 4.13 examines airspace safety concerns. The proposed action does not involve the establishment of new airspace.
- W-293 Comment noted.
- W-294 Impacts to domestic animals and wildlife have been identified and are discussed in Sections 4.3 and 4.5 and in Appendix J. In response to public comment, additional information on this subject has been included in Appendix J. As discussed, in some circumstances, low-level aircraft flight may result in incidental livestock startle that may or may not lead to livestock damage.
- W-295 Air Force Regulations specify procedures that may be followed in regard to claims for damages made against the Air Force. However, property damage and associated economic losses can only be determined by review of the circumstances of the individual case. Information on filing claims for damages can be obtained by contacting the Holloman AFB Public Affairs Office at 505-475-5406.
- W-296 Section 4.9 addresses the economic impact to Otero County if the impact area were to be excluded from grazing. Section 4.3 has been expanded to address compatibility of aircraft operations with grazing and ranching operations. Impacts to domestic animals and wildlife have been identified and are discussed in Section 4.5 and Appendix J. In response to public comment, additional information has been added to Appendix J on this subject. As discussed, in some circumstances, low-level aircraft flight may result in incidental livestock startle that may or may not lead to livestock damage. Property damage and associated economic losses can only be determined by review of the circumstances of the individual case.

- W-297 Appendix D provides a broad range of information on noise and its effects. In response to public comment, additional information on human health effects has been provided in Sections 4.2 and 4.3.
- W-298 Appendix D discusses reproduction-related aspects of noise for humans and animals. The effects of the proposed action on airspace safety considerations are addressed in Section 4.13.
- W-299 Information on the response of domestic animals to low-level overflight is provided in Appendix J, which has been expanded in response to public comment. Impacts to domestic animals and wildlife have been identified and are discussed in Sections 4.3 and 4.5. As discussed, in some circumstances, low-level aircraft flight may result in incidental livestock startle that may or may not lead to livestock damage or property damage. However, property damage and associated economic losses can only be determined by review of the circumstances of the individual case. In response to public comment, Section 4.9 has been expanded to address this issue. Section 4.2 has been expanded to provide a discussion of the effect of noise on human health.
- W-300 See responses to comment numbers W-294 to W-299, above.
- W-301 Under the No-Action alternative, additional GAF aircrews and Tornado aircraft would not come to Holloman AFB. The EIS does consider an Existing Range training option, which would not involve the establishment of a new air-to-ground range.
- W-302 The proposed action does not involve the acquisition of additional land to support the development of an NTC. Future requirements are beyond the scope of this EIS.
- W-303 Real property losses and economic losses can only be determined by review of the circumstances of each individual case and cannot be generalized into an overall impact. Section 4.2 has been expanded to provide a discussion of the effect of noise on human health.
- W-304 The proposed action does not involve the expansion of McGregor Range. The area being considered for development of an NTC is within the existing McGregor Range. For the Tularosa Basin NTC training option, this EIS evaluates the suggested cleanup approach suggested by several commenters.
- W-305 Impacts to domestic animals and wildlife have been identified and are discussed in Sections 4.3 and 4.5 and in Appendix J. In response to public comment, additional information on this subject has been

included in Appendix J. Potential responses by threatened and endangered species and bison and other livestock are identified in Section 4.5 and Appendix J. The Air Force is consulting and will complete consultations with the U.S. Fish and Wildlife Service prior to implementation of activities.

- W-306 Comment noted.
- W-307 The airspace structure of the MTRs is provided in Table 3.1-1 of the EIS. Additional airspace information is provided in Section 3.1. As indicated in Section 3.1 of the EIS, military flights are compatible with civil aviation activities when all pilots adhere to Federal Aviation Regulation Part 91, see-and-avoid flight practices. Flight safety is addressed in Sections 3.13 and 4.13.
- W-308 The public comment period ended August 4, 1997. However, all comments received by August 30, 1997 that are relevant to the proposed action have been taken into consideration in the EIS.
- W-309 The EIS has been expanded in response to specific comments submitted during the public comment period. Comments regarding the document have been addressed, and the text revised or expanded where appropriate. Aircraft turbulence from low-level overflight (also known as "wing-tip vortices") is a very localized phenomenon. The vortices quickly abate with time and distance from the aircraft. With the FAA restrictions permitting overflight of structures to no closer than 500 feet, it is not anticipated that the low-level flights would cause damage in a properly constructed and maintained structure.
- W-310 The EIS makes use of the 1990 Census, the most recent available data from the Census Bureau, as well as information obtained from local community planning input.
- W-311 The EIS represents a useful source of information for use in evaluating the current proposed action.
- W-312 Section 4.9 has been expanded in response to public comments concerning socioeconomic impact in areas overflowed by aircraft under the proposed action.
- W-313 Environmental Justice is addressed in Sections 3.9 and 4.9.
- W-314 Comment noted. Specific comments submitted during the public comment period regarding the document have been addressed, and the text revised or expanded where appropriate.

- W-315 The EIS makes use of the 1990 Census, the most recent available data from the Census Bureau.
- W-316 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions.
- W-317 The EIS has been revised where appropriate, when comments have been made concerning specific errors or misunderstandings. The Air Force has made every effort to accurately portray conditions and impacts pursuant to the proposed action and alternatives.
- W-318 The proposed action is under consideration. A decision has not been made as to whether to approve the proposed action or the no-action alternative. The decision document for an EIS is a "Record of Decision" (ROD), not "A Finding of No Significant Impact" (FONSI).
- W-319 The analysis in the EIS takes into account changes in route structure being considered in the ALCM/Talon EA. Flight profiles for the proposed action (see Chapter 2) show airspeeds up to 500 KIA, or 575 mph. Aircraft turbulence from low-level overflight (also known as "wing-tip vortices") is a very localized phenomenon. The vortices quickly abate with time and distance from the aircraft.
- W-320 The phrase "sparse population" is used in discussing population levels in portions of the Tularosa Basin. The population density of that portion of the Tularosa Basin under consideration (roughly Otero County) is estimated at eight persons per square mile. CEQ regulations provide a definition for significance that is based on the intensity (or severity) and the context, (or setting) of the impact. This definition was used in assessing whether an impact would be significant. It is also important to note that impacts of the proposal are assessed relative to baseline conditions. If the difference between conditions with and without the proposed action is small, the impact will usually be considered insignificant.
- W-321 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed.

- W-322 This comment is in reference to the ALCM/Talon EA, rather than the EIS.
- W-323 The procedure used to calculate the noise levels and their impacts is based on established scientific methods and analysis. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Section 4.2 of the EIS details the noise modeling approach, the reliability of the noise predictions, and the accuracy of the noise predictions. Sections 3.4 and 4.4 address the air quality aspects of the proposed action.
- W-324 This comment is in reference to the ALCM/Talon EA, rather than the EIS. The procedures and source terms used in the analyses for the proposed action are based on established scientific methods and the most appropriate data for the analyses involved. Section 3.2 has been expanded in response to public comments to further explain the use of day-night average sound level measurements. Flight profiles for the proposed action (see Chapter 2) show airspeeds up to 500 KIA, or 575 mph.
- W-325 The EIS addresses effects of overflight on uses of both private and government-owned land throughout the region.
- W-326 Real property losses and economic losses can only be determined by review of the circumstances of each individual case and cannot be generalized into an overall impact. The proposed action would be in compliance with all applicable laws and regulations, including FAA regulations concerning low-level flying.
- W-327 The proposed action does not involve a change in route altitude structure, other modifications to existing airspace, the development of new airspace, or the acquisition of privately held land. The proposed action does involve changes in operations on existing airspace. All activities within that airspace would be in compliance with all applicable laws and regulations, including FAA regulations concerning low-level flying.
- W-328 The flight profiles provided in Table 2.1-8 present airspeeds and altitudes characteristic of operations in the affected airspace for the proposed action. The basic methodology used for each media is either explained in the EIS or referenced documents.

- W-329 The Air Force appreciates receiving this information. However, the area indicated ("just west of Marathon south of the Glass Mountains") does not underlie any of the airspace affected by the proposed action.
- W-330 Section 4.9 has been expanded in response to public comments concerning socioeconomic impact in areas overflown by aircraft under the proposed action.
- W-331 Environmental Justice is addressed in Sections 3.9 and 4.9.
- W-332 The procedures and source terms used in the analyses represent the best available technology and most appropriate data for the analyses involved.
- W-333 Concerns with existing operations should be directed toward the Public Affairs Office at Holloman AFB (505-475-5406).
- W-334 Additional information on the auction process has been provided in Section 3.3.
- W-335 Additional information on hunting and grazing on Otero mesa has been incorporated in Sections 3.3 and 4.3. Sections 3.5 and 4.5 address regional wildlife populations.
- W-336 These materials have been considered. (See responses to comments 309 to W-332.)
- W-337 Table 4.2-3 provides data on noise levels that would be experienced by a ground-based observer at various distances from the line of flight for an aircraft at different altitudes. The data for both are presented for both the A-weighted sound exposure level (SEL) metric, and the L_{max} A-weighted metric. For a Tornado overflight at 100 feet, the maximum noise levels would be 119 dB using the SEL metric, and 124 dB using the L_{max} metric. Only sounds lasting more than one second above a sound level (sound pressure level) of 130 dB using the L_{max} metric are potentially damaging to structural components (National Research Council, 1977). The reference to 110 dB as the maximum noise levels resulting from the proposed action was (a) given in the context of another project, and (b) was an approximation of the noise that would result from overflight at 500 feet, the lowest altitude under FAA regulations at which an aircraft is permitted to overfly a structure.

As shown in Table 4.2-3, a noise level of 108 dB for either the L_{max} or SEL metric, would be expected for a Tornado overflight at 500 feet. Somewhat higher noise levels would be expected for overflight by some of the other aircraft shown on the table. However, in west Texas, only operations by the Tornado would be affected by the proposed action, and in no case would the L_{max} levels exceed 130 dB.

- W-338 A "weekend training alternative" is not considered to be materially different, in most respects, from the Existing Range training option assessed under the proposed action. In neither case would an NTC be constructed, and airspace use would be similar. Since the total number of sorties would be similar, environmental impacts related to airspace use would also be similar. A weekend training option would, however, require a substantial build-up of support personnel at Holloman AFB. In addition, a change to a routine weekend-training regimen would, in peacetime, result in unwarranted hardship on the family life of U.S. Air Force aircrew and support personnel. As with the Existing Range training option, this alternative would result in a reduction in training effectiveness, and would require some components of the Tornado training syllabus to be met elsewhere. Since a weekend training option would yield no training benefit other than that which could be obtained through a less costly and morale-damaging option, it was concluded that there would be no merit in examining this option in detail.
- W-339 Anticipated impacts to public access, use, and enjoyment of public lands, as well as to custom and culture uses are addressed in Sections 4.3, 4.6, and 4.9.
- W-340 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions.
- W-341 This is outside of the scope of the EIS.
- W-342 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed.

- W-343 Section 4.5 has been expanded to address issues raised in this comment.
- W-344 The EIS identifies these as potential impacts. In response to public comment, additional information on this subject has been provided in Section 4.5.
- W-345 Sections 3.5 and 4.5 have been expanded to address concerns raised by the USFWS. The Air Force is sensitive to the need to mitigate impacts of this action. Once formal consultations are completed, appropriate mitigations will be identified and implemented. The Air Force will work with DOI personnel to develop any necessary mitigation measures. Such measures as agreed upon would be included in the Record of Decision.
- W-346 The Air Force initiated formal consultation with USFWS November 24, 1997. Once consultation is completed, mitigations will be implemented as appropriate.
- W-347 Cumulative impacts of the proposed action are identified and discussed in Chapter 5 of the EIS for each resource. Where appropriate, mitigations will be identified and implemented once formal consultations with the USFWS are completed.
- W-348 Section 4.5 has been expanded to more fully describe the projected impacts on biological resources. Mitigative measures have been identified where appropriate. Once formal consultations with the USFWS are completed, appropriate mitigations will be implemented.
- W-349 Public hearing locations were selected based on areas identified as significantly affected by the proposal, and based on public inputs/response during the public scoping period.
- W-350 Section 4.3 has been expanded to address mineral resource concerns.
- W-351 The Military Lands Withdrawal Act withdrew the McGregor Range for 15 years. The withdrawal is scheduled to expire on November 6, 2001. The U.S. Army proposes to re-withdraw the McGregor Range and a draft EIS on this proposal is expected to be issued in 1998 for public review. The Executive Summary has been revised to clarify the status of McGregor Range.
- W-352 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately

assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed.

- W-353 The EIS indicates that these areas would generally be closed on weekdays for about 12 hours. Specific closure times and variations from this anticipated schedule would depend on coordination of activities by several military users and cannot be predicted.
- W-354 In response to public comment, information on cumulative impacts has been expanded and consolidated into Chapter 5 of the EIS.
- W-355 Section 4.3 has been clarified to quantify the area within the safety footprint to which access would be restricted during training periods. There would be no reduction in available grazing land.
- W-356 Section 4.13 addresses the current UXO aspects of the West Otero Mesa site.
- W-357 Previous environmental deterioration at a site due to past activities was not used as a criterion in evaluating the effects of the proposed action. The analysis does, however, present an objective description of the impacts that would be expected for both the Tularosa Basin and West Otero Mesa sites if either of the NTC training options were to be implemented.
- W-358 Approximately 1,024 acres of land would be cleared of vegetation to establish the NTC under the West Otero Mesa training option. This affected area could be anywhere within the 5,120-acre impact area. The EIS has been revised to clarify the biological resources impacts and mitigation measures. The significance of identified impacts will be determined in the Record of Decision. The loss of up to 5,120 acres of habitat through the construction and use of an NTC represents about 3 percent of the portion of Otero Mesa on McGregor Range and about 0.4 percent of the entire Otero Mesa landform that extends into Texas.
- W-359 The EIS identifies that the 5,120 acres of grassland represent less than one percent of the desert grassland of the Otero Mesa landform. Other desert grasslands also remain. Desert grasslands have been substantially reduced from their historic levels, and it may be reasonable to avoid disturbance when possible. The loss of the 1,024 acres (20 percent of the 5,120 acre NTC on Otero Mesa) is a small contribution to the cumulative loss of this vegetation type.
- W-360 The west Otero Mesa location is near the edge of the mesa. The vegetation structure of habitat below the mesa is generally not

appropriate as aplomado falcon habitat due to high shrub composition. Therefore, implementation of the West Otero Mesa training option would result in some loss of potential habitat for the aplomado falcon, but would not result in habitat fragmentation.

- W-361 Section 4.9 has been expanded in response to public comments concerning socioeconomic impact in areas overflowed by aircraft under the proposed action. In addition, Section 4.3 has been expanded to address impacts to the historic uses of the landscape.
- W-362 The analysis in Section 4.5 is based on established concepts (see Table 4.5-1). The justifications for specific impact assignments are presented in this section and summarized in Table 4.5-2.
- W-363 The Section 7 consultations are ongoing. Once consultations are completed, appropriate mitigations will be implemented.
- W-364 The proposed action would not affect oil and gas development in southeastern New Mexico.
- W-365 Section 3.3 has been expanded to include this information.
- W-366 In response to public comment, additional information has been incorporated in Sections 3.3 and 4.3 concerning ACECs within the area affected by the proposed action.
- W-367 Comment noted. The U.S. Army also carries out activities in these areas.
- W-368 Spelling has been revised.
- W-369 Sections 3.3 and 4.3 have been revised to include additional information and analyses of grazing operations and affected ranchers.
- W-370 Spelling has been revised.
- W-371 This is indicated in Section 3.3.
- W-372 The approximate times of closure for military missions are identified in Section 3.3. Access can also be restricted when the Army is performing environmental surveys and maintenance.
- W-373 Implementation of the proposed action would not require restriction of access to any area north of State Road 506, including Lincoln National Forest. As a result, access to Lincoln National Forest for hunting would not be affected. Potential impacts on hunting within

Lincoln National Forest due to activities unrelated to the proposed action are not within the scope of this EIS.

- W-374 Section 3.3 has been revised to reflect this information. However, the MOU between Army, BLM, and NMSU does not provide for recreational use. Some public organizations may conduct periodic educational tours of this area.
- W-375 The paragraph in question simply states a quantitative measure of vegetation. No interpretation of the data is made.
- W-376 In response to public comment, Section 3.5 has been expanded to include additional information.
- W-377 In response to public comment, Section 3.5 has been expanded to include additional information.
- W-378 In response to public comment, Section 4.6 has been expanded to address this issue.
- W-379 Comment noted.
- W-380 A brief synopsis of Oliver Lee's role in the region's history has been added to Section 3.6 of the EIS.
- W-381 More recent historical information has been added to Section 3.6.
- W-382 Sections 3.7, 4.7, and 4.11 have been expanded more fully to describe the McGregor Range water developments, including items within the safety area and NTC areas.
- W-383 In response to public comments, Section 4.3 has been expanded with additional information on customs and culture.
- W-384 In response to public comment, Sections 3.10 and 4.10 have been expanded to include additional information on this subject.
- W-385 The baseline potable water demand at Holloman AFB in FY00 is projected to be 2.14 mgd. Project-related effects would increase on-base demand by 0.16 mgd to 2.3 mgd. This increase was determined based on data from a U.S. Army Corps of Engineers study of the proposed construction on-base, and the demands associated with each building. Section 4.11 has been revised to clarify this point.
- W-386 A large amount of information exists concerning the adverse effects to natural vegetation and soil from grazing of cattle. This

information, however, was not pertinent to the calculations in Appendix H in which soil erosion was estimated. In fact, identical "C" values (soil cover and management) were used for both the West Otero Mesa site (which is grazed) and the Tularosa Basin site (which is not grazed).

- W-387 In response to public comments, Section 3.13 has been revised to reflect this observation. .
- W-388 Steps taken to minimize bird-aircraft strike risk are discussed in Sections 4.5 and 4.13.
- W-389 Potential effects to park activities are addressed in Section 4.3. Increased departures over White Sands National Monument could result in an increase in the number of inadvertent overflights of facilities. Runway use and take-off and landing directions are dictated by factors as wind direction, route of flight, and other such factors that affect flight safety; therefore, use of any given runway cannot be based solely on noise effects. Operational procedures at Holloman AFB are designed to avoid as much as possible overflight of the adjacent monument headquarters. These procedures include avoidance of direct overflight of the monument headquarters below 2,000 feet AGL within one NM.
- W-390 Projected baseline noise levels are based on aircraft activities in FY00, as presented in Chapter 2.
- W-391 The Executive Summary has been expanded in response to public comment.
- W-392 Text on relocation of water supply structures and coordination of actions with BLM have been added to Sections 4.3, 4.7, and 4.11. The impact of grazing is addressed in Section 4.3.
- W-393 It should be noted that the use of the restricted airspace above McGregor Range predates the establishment of Culp Canyon Wilderness Study Area, and that this pre-existing military activity was considered as a possible reason for not making it a Wilderness Area. Further, under the NTC training options, aircraft activity making use of the NTC itself would be concentrated tightly along the proposed flight patterns. As shown in Figure 4.2-4, noise levels would drop off rapidly with distance from the centerline of the flight pattern, and would return to baseline levels within less than a mile of the centerline. The nearest border of the Culp Canyon WSA is two to three miles from the closest flight pattern for the Tularosa Basin NTC, and more than five miles for the closest flight pattern for the

West Otero Mesa NTC. Further, FY00 baseline noise levels for this general area are estimated at about 54 dB; under the NTC training options, these noise levels in this area would drop to about 50 dB. Thus, with respect to noise levels within Culp Canyon WSA, no adverse impact would be expected.

- W-394 Grazing is discussed in Sections 3.3 and 4.3..
- W-395 Section 4.3 has been revised to clarify impacts specific to the Tularosa Basin training option. While the Tularosa Basin site is wholly contained in the area off Otero Mesa, a portion of the safety area extends onto a small portion of the mesa, as shown in Figure 2.1-11. Access to this area would be restricted when the NTC is in use.
- W-396 In response to public comment, additional material has been added to Section 3.13 to address these issues.
- W-397 The West Otero Mesa NTC would not be completely bladed, only those areas that would be used for firebreaks, roads, or target areas. It is important to remember that the formal consultation process under Section 7 is required by the Endangered Species Act, not by NEPA, and does not provide for public review and comment. The Air Force is currently in the process of formal consultation with USFWS.
- W-398 The statements are consistent. Information on page 4-72 of the Draft EIS discusses hypothesized effects and studies that show effects were not observed. The statement on page 4-78 states no effect would be expected.
- W-399 The amount of habitat is based on field surveys and evaluations conducted by Fort Bliss. Section 4.5 has been expanded to give this subject further consideration.
- W-400 Section 4.5 has been expanded to take this into consideration.
- W-401 The Sacramento Escarpment ACEC is not within the area affected by the proposed action. Information on the remaining features has been added to Sections 3.3 and 4.3.
- W-402 It is expected that if service on these pipelines is interrupted by damage to the pipeline, the NTC would stand down, and repairs will be implemented immediately. It is expected that any down-time for the pipeline would be minimal. Section 4.7 has been revised to reflect coordination with BLM.
- W-403 Section 3.7 has been expanded to reflect this additional information.

- W-404 In response to public comment, Section 4.8 has been expanded to address this point.
- W-405 Section 4.9 has been expanded in response to public comments concerning socioeconomic impact in areas overflowed by aircraft under the proposed action. In addition, Section 4.3 has been expanded to address impacts to the historic uses of the landscape.
- W-406 In response to public comment, Sections 3.10 and 4.10 have been expanded to include additional information on this subject. State Road 506 would not be closed under any of the training options.
- W-407 Section 3.11 has been expanded to reflect the existing status of the pipeline. As discussed in Section 4.11, current water treatment, storage, and distribution facilities would be expected to be able to meet the demands associated with this proposed action.
- W-408 Section 4.11 has been expanded to clarify that the proposed action would not require additional water resources.
- W-409 Discussion of mitigations has been added to the document where appropriate.
- W-410 Spelling has been revised.
- W-411 The data have been added.
- W-412 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed
- W-413 The Air Force has been in informal endangered species consultation throughout the process. The Air Force entered into formal consultation on this matter November 24, 1997.
- W-414 Appendix G has been expanded to include direct input from Otero County.
- W-415 Section 5.2 addresses irreversible and irretrievable commitment of resources.
- W-416 Comment noted.

- W-417 All comments received are included as part of the EIS. Comment letters are included as a separate volume of the document.
- W-418 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed
- W-419 Section 4.2 has been expanded to address the noise levels if the ALCM/Talon action is not implemented.
- W-420 As described in Chapter 2, the sortie levels projected for FY00 take into account other actions that would be implemented by FY00. The ALCM/Talon action is pending FAA approval. The analysis takes this into account, and presents sortie levels with Tables 2.1-6 and 2.1-7 and without (Tables 2.1-9 and 2.1-10) this action.
- W-421 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed.
- W-422 The Executive Summary is not intended to exhaustively discuss any given topic. In Chapter 4, each resource explicitly addresses all options, including the No-Action alternative. In the absence of perturbations such as would arise due to implementation of a training option, the conditions that would prevail in FY00 are the same as those projected in Chapter 3.
- W-423 As stated in Chapter 2, if the No-Action alternative is implemented then the 30 Tornado aircraft and associated personnel would not come to Holloman AFB.
- W-424 Additional information and analysis of impacts on grazing have been included in Sections 3.3 and 4.3 of the document.
- W-425 In response to public comment, Sections 4.3 and 4.9 have been expanded to include additional information and analysis of grazing operations. The proposed action would not preclude grazing within the safety area, outside the impact area.
- W-426 Impacts to domestic animals and wildlife have been identified and are discussed in Sections 4.3, 4.5, and Appendix J. In response to public comment, additional information on this subject has been

included in Appendix J. As discussed, in some circumstances, low-level aircraft flight may result in incidental livestock startle that may or may not lead to livestock damage.

- W-427 Grama grass cactus populations are found in many locations in New Mexico, including Otero Mesa. Habitat exists for this species on the West Otero Mesa NTC site. No specimens of this species were found on the West Otero Mesa site during the 1997 field survey. Since only portions of the site were surveyed, it is possible that grama grass cactus is present on the site. However, the species has been recently down-listed from the New Mexico listed species, because it is now considered common in the state.
- W-428 Sections 3.5 and 4.5 have been revised to reflect this information.
- W-429 Section 4.5 has been revised to reflect this information.
- W-430 The status of these species is indicated in Table 3.5-4.
- W-431 The Draft EIS was published before this document was finalized. Sections 3.3 and 4.3 have been expanded to give consideration to this matter.
- W-432 Comment noted.
- W-433 The Executive Summary has been revised to clarify this point.
- W-434 In response to public comment, additional information on the subject of water resources and supply has been provided in Sections 3.7, 4.7, 3.11, and 4.11.
- W-435 In response to public comment, additional information on the subject of water resources and supply has been provided in Sections 3.7, 4.7, 3.11, and 4.11.
- W-436 In response to public comment, Sections 4.3 and 4.9 have been expanded to include additional information and analysis of grazing operations.
- W-437 In response to public comment, Section 4.3 and Appendix G have been expanded to include additional information and analysis of grazing operations.

- W-438 Purpose and need for the proposed action are fully discussed in Chapter 1. Issues concerning national policy are beyond the scope of this EIS.
- W-439 The Tornado can operate during a non-training mission at distances of up to 350 nautical miles from its base without refueling. However, training missions require that a portion of the time in the air be spent executing training activities. In order to accomplish these training activities, and to provide for a margin of safety, a target complex should be well within the maximum flying distance of the aircraft. In the case of the Tornado, taking into account the amount of time that would be spent in training activities, and providing a margin of safety, the maximum distance that a training complex could be located would be 180 nautical miles from Holloman AFB. These issues are discussed in Chapter 2.
- W-440 The explanation for the development of the FY00 baseline is presented in Chapter 2.
- W-441 Environmental standards are not calculated but are defined by regulations. The sortie data are projections, and are accepted as best available data for defining military aircraft activity in the affected area. As such, the emissions calculations are appropriate estimates of air quality emissions due to military aircraft activity in the affected area.
- W-442 Section 3.1 has been revised to clarify this point.
- W-443 This statement refers to the conclusions of previous assessments. The cumulative effects of all of these actions on airspace management are addressed in Chapter 5.
- W-444 The leases involving the land in question are awarded through an auction process. As a result, the identity of the lessees changes periodically. As discussed in Section 4.3, the leased lands are used for cattle grazing.
- W-445 Air quality discussion in Sections 3.4 and 4.4 has been expanded to clarify this point.
- W-446 Table 3.5-4 provides data on protected or sensitive plant species that could be in the area affected by ground activities under the proposed action. Data from surveys of the West Otero Mesa site does not indicate the presence of any protected species of plant. As pointed out in Table 3.5-4, while habitat for the grama grass cactus is present on the site, this species was not found during the site survey.

- W-447 These species have a wider distribution than Otero Mesa. The reference to them in the EIS is related to where they have been found on McGregor Range. Impacts to wildlife from construction and use of the NTC are described in Section 4.5.
- W-448 The section in question deals with general biota, rather than with protected species. Protected species are presented in Section 3.5.4. The status of such species is provided in Table 3.5-4.
- W-449 Information on the meaning of various categories of protection is provided in Table 3.5-4.
- W-450 Sections 3.5 and 4.5 have been expanded to further address biological resources. No federal protected (endangered, threatened, proposed for listing, or candidate) species were observed on the NTC during surveys supporting preparation of the EIS. Federal protected species that have been observed on McGregor Range include (from Chapter 4 of the Draft EIS): peregrine falcon (Sacramento Mountains at north edge of McGregor), Mexican spotted owl (Sacramento Mountains at north edge of McGregor), bald eagles (mainly Sacramento Mountains at north edge of McGregor), piping plover (rare observation on McGregor, limited habitat).
- W-451 At the time the Draft EIS was issued, the analysis of the information gathered during the cultural resource survey of the NTC areas had not been completed. The estimated number of sites recommended as eligible or not eligible for listing on the National Register were preliminary and were so noted in the Draft EIS. Section 106 of the National Historic Preservation Act requires that a determination of eligibility must be completed before a Federal undertaking is implemented. The determinations of eligibility for the cultural resources identified during the survey will be submitted to the New Mexico State Historic Preservation Office. Cultural resources within the selected NTC eligible for listing in the National Register would either be avoided or mitigated in order to retrieve important information and artifacts.
- W-452 Components of the local water supply system that lie within the NTC impact area would be relocated outside the impact area during construction. Therefore, the proposed action would not adversely affect water distribution on west Otero Mesa.
- W-453 Rainfall is considered in Sections 3.7 and 4.7. No data are available specifically for the West Otero Mesa and Tularosa Basin sites, but the document indicates that rainfall in the area is slight.

- W-454 A large amount of information exists concerning the adverse effects to natural vegetation and soil from grazing of cattle. This information, however, was not pertinent to the calculations in Appendix H in which soil erosion was estimated. In fact, identical "C" values (soil cover and management) were used for both the West Otero Mesa site (which is grazed) and the Tularosa Basin site (which is not grazed).
- W-455 The procedure used to calculate the noise levels and their impacts is based on established scientific methods and analysis. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Section 4.2 of the EIS details the noise modeling approach, the reliability of the noise predictions, and the accuracy of the noise predictions. Appendix D provides a broad range of information on noise and its effects. In response to public comment, additional information on human health effects has been provided in Sections 4.2 and 4.3.
- W-456 In response to public comment, additional information on the effect of noise on humans has been provided in Sections 4.2 and 4.3.
- W-457 The procedures and source terms used in the analyses are based on established scientific methods and techniques, and make use of the most appropriate data for the analyses involved. Section 3.2 has been expanded in response to public comments to further explain the use of day-night average sound level measurements.
- W-458 Section 4.2 has been expanded to provide additional information on the possible health effects of aircraft noise.
- W-459 Section 3.2 has been expanded in response to public comments to further explain the use of day-night average sound level measurements.
- W-460 State Road 506 is closed occasionally due to existing activities on the range. Implementation of either the Tularosa Basin or West Otero Mesa training option would not require periodic closure of this road, and would not affect traffic flow. State Road 506 is currently, and will continue to be, maintained by the County. In response to public comment, Sections 3.10 and 4.10 have been expanded to include additional information on this subject.

- W-461 Section 4.3 has been revised to include additional quantification of the grazing areas affected.
- W-462 Sections 4.3 and 4.9 have been revised to include additional information and analysis of grazing operations and affected ranchers.
- W-463 Real property losses and economic losses can only be determined by review of the circumstances of each individual case and cannot be generalized into an overall impact. Air Force Regulations provide an established process through which damage claims can be submitted. Information on filing claims for damages can be obtained by contacting the Holloman AFB Public Affairs Office at 505-475-5406.
- W-464 Environmental Justice issues are considered in Sections 3.9 and 4.9. The grazing leases on west Otero Mesa are awarded annually through an auction process. The leases are awarded to the highest bidder, and the individuals who receive the leases can, and do, change annually. As a result, it is not possible to predict how lease possession would interact with minority status. Since relatively few individuals are involved in any case, this would not seem to be an issue under Environmental Justice.
- W-465 Additional information has been incorporated in Sections 4.3 and 4.9 to address potential impacts on the agricultural community. It should be noted that the proposed action does not involve the withdrawal of land. The affected property on McGregor Range is presently withdrawn.
- W-466 Analysis conducted using the NMSU Input-Output model indicates a direct loss of 425 AUMs. The loss of 425 AUMs was estimated to result in annual impacts of \$40,000 to \$48,000 by NMSU. The \$150,000 to \$200,000 figure mentioned in the comment is based on the assumption that the AUMs would also be substantially reduced outside the range in the non-impact safety area. Experience with ranching operations throughout the West, including New Mexico, has demonstrated that cattle graze up to the fence of a range and would graze on an active range if permitted. From western ranching, and New Mexico experience, there is no basis for assuming a reduction in grazing within the safety area or for estimating an impact greater than the \$40,000 to \$48,000 from NMSU. Discussion of these cost impacts has been added to Section 4.9.
- W-467 Comment noted.
- W-468 Pipeline repairs would be accomplished in a timely manner.

- W-469 Section 4.3 has been revised to address this comment.
- W-470 Section 3.2 has been expanded in response to public comments to further explain the use of day-night average sound level measurements. With regard to noise levels in the vicinity of Otero Mesa, in response to public comments more refined analytical techniques have been applied to this issue to provide a more exact understanding of potential noise levels in this area. Results of this analysis are presented in Section 4.2. Under the NTC training options, proposed aircraft activity would be concentrated tightly along the proposed flight patterns. As shown in Figure 4.2-4, noise levels would drop off rapidly with distance from the centerline of the flight pattern, and would return to baseline levels within less than a mile of the centerline. The maximum noise levels that would be experienced in areas adjacent to McGregor Range are projected to be about 62 dB (L_{dnmr}). Given an altitude of 1500 feet AGL on the flight pattern, maximum SELs of about 103 dB would be expected for the Tornado aircraft.
- W-471 Documentation of correspondence with the Mescalero Apache Tribe has been included in the EIS.
- W-472 The analysis contained in the EIS indicates that there would be no significant impact to surface water or groundwater resources.
- W-473 Additional information has been incorporated in Sections 4.3 and 4.9 to address potential impacts on the agricultural community.
- W-474 These issues are addressed in Sections 3.5, 3.13, 4.5, and 4.13.
- W-475 Real property losses and economic losses can only be determined by review of the circumstances of each individual case and cannot be generalized into an overall impact.
- W-476 It is important to remember that the formal consultation process under Section 7 is required by the Endangered Species Act, not by NEPA, and does not provide for public review and comment. The Air Force is currently in the process of formal consultation with USFWS.
- W-477 This comment reflects studies published in 1978 which relate changes in property value near airports with increasing noise levels. Results of more recent studies (i.e., Collins & Evans, 1994, *Journal of Transport Economics and Policy*) have made these earlier findings controversial. Without commenting on the merit of these studies, it

is pointed out that they are specific to the near-airport environment, and are inapplicable to the episodic noise environment of an MTR. In general, there is no solid evidence to support the estimation of a loss in property values due to low-level overflights.

- W-478 The action under consideration is a proposed action. No decision has been reached as to whether or not to implement the proposed action, any of the training options, or the No-Action alternative.
- W-479 The action in question involved maintenance activity by the Army for an existing road. This action was unrelated to the proposed action which is the subject of this EIS.
- W-480 All comments received have been given critical examination. Where appropriate, the text of the EIS has been expanded to reflect comments received.
- W-481 This comment letter has been included in Volume III of the Final EIS.
- W-482 All comments received have been given critical examination. Where appropriate, the text of the EIS has been expanded to reflect comments received.
- W-483 When completed, the final report on the archaeological inventory for the two NTC option locations will be made available to the Mescalero Apache, the New Mexico SHPO, and others as required by Section 106. Because the document contains confidential information, ARPA requires that the report not be released to the public.
- W-484 A search of the archaeological records at Fort Bliss was made prior to field work for the archaeological inventory. All previously documented sites and newly identified sites within the two NTC option locations were investigated. No springs or trails were located. Any information the Mescalero Apache wish to share about Apache archaeological sites within the two NTC option locations would be appreciated by the Air Force.
- W-484a These comments pertain primarily to a separate document, the Environmental Assessment (EA), *Proposed Airspace Modifications to Support Units at Holloman AFB, New Mexico*, which addresses an independent proposal by the Air Force. Some of the comments refer to differences between that EA and the Draft Environmental Impact Statement (EIS), *Proposed Expansion of German Air Force Operations at Holloman AFB, New Mexico*. It is not unusual for EAs and EIS's to differ in the topics they address and the level of detail of the analysis.

Some of the differences reflect differences in the proposals themselves and in the issues of concern. For example, the proposed beddown of 30 additional Tornado aircraft at Holloman AFB includes elements, such as an increase in personnel at the base, which are not part of the proposed airspace modifications.

The principal purpose of an EA is to determine whether to prepare an EIS or a Finding of No Significant Impact. An EIS, on the other hand, is a detailed report on a major federal action that may significantly affect the environment. As such, it is typically more detailed than an assessment. Under Council on Environmental Quality Regulations implementing the National Environmental Policy Act, economic or social effects are not intended by themselves to require preparation of an EIS, so they are frequently not included in EAs. The regulations also stipulate, however, that when an EIS is prepared and economic (or social) and natural (or physical) effects are interrelated, the EIS should include a discussion of those effects. Therefore, socioeconomic impacts are discussed in this EIS.

As the EIS indicates, the proposal to beddown the additional 30 aircraft includes using the modified airspace, if those modifications are implemented. Because these are separate proposals, the EIS also analyzes the environmental consequences should the proposed airspace modification not be implemented. In that case, it would still be possible for German operations to be expanded at Holloman AFB and the additional aircraft to use existing airspace.

The EIS also presents relevant data on and analysis of potential noise and safety impacts from the proposed expansion of German Air Force operations and addresses compliance with Federal Aviation Regulations. This includes available data on health effects of noise (see Section 4.2 and Appendix D). It also includes an analysis of the risk of mishap (accident), based on aircraft-specific historic mishap rates and the projected number of flying hours, calculated as the number of sorties (a sortie includes only one aircraft; a formation of three aircraft is counted as three sorties) multiplied by the average sortie duration (see Section 4.13).

- W-485 Section 4.1 has been clarified to indicate that tanker-to-Tornado refueling occurs at the high altitudes, and Tornado-to-Tornado refueling occurs at about 1,000 feet AGL.
- W-486 The procedure used to calculate the noise levels and their impacts is based on established scientific methods and analysis. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included

representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Section 4.2 of the EIS details the noise modeling approach, the reliability of the noise predictions, and the accuracy of the noise predictions.

- W-487 The data in Table 4.2-1 are representative of noise from aircraft operations in airspace used under the proposed action.
- W-488 Aircraft turbulence from low-level overflight (also known as "wing-tip vortices") is a very localized phenomenon. The vortices quickly abate with time and distance from the aircraft. FAA restrictions permit overflight of structures at distances no closer than 500 feet; it is not anticipated that turbulence from low-level flights would result in any adverse effect on maintenance crews servicing radiotelescopes.
- W-489 The analysis considers aircraft operations in all affected airspace, including MTRs. Table 4.2-4, for example, shows baseline and expected noise levels at specific points throughout the affected area. The location of these points is provided in Figure 4.2-3. Taken together, the table and figure provide accurate information on expected noise levels at specific locations throughout the affected area.
- W-490 The emission calculations are based on the best available compilations of emission factors and calculation methods. The emission factors for determining criteria pollutant emissions are provided by the most recent EPA and Air Force compilations for military and civilian aircraft (EPA, 1992; Jagielski and O'Brien, 1993). Data on airspeed for the aircraft involved is provided in Chapter 2.
- W-491 Combined CO and NO_x emissions in FY00 for the west Texas airspace affected by the proposed action (IR-102/141 and IR-192/194) amounts to about 58 tons per year (see Section 3.4). Under the proposed action, these combined emissions would amount to 117 tons per year (see Section 4.4). The projected increase in emissions for these two pollutants is approximately 100 percent of the FY00 baseline conditions. While this is a substantial increase, the analysis indicates that the proposed change in operations would not result in a significant impact to air quality, either locally or regionally.
- W-492 Noise, air quality, and land use impacts are addressed in Sections 4.2, 4.4, and 4.3, respectively. The EIS addresses changes in environmental conditions in all areas affected by aircraft operation.

- W-493 The Air Force appreciates receiving this information. However, the area indicated ("just west of Marathon south of the Glass Mountains") does not underlie any of the airspace affected by the proposed action.
- W-494 The EIS addresses the areas affected by aircraft overflight, including areas underlying the affected MTRs. See Sections 3.5 and 4.5, as well as Appendix J.
- W-495 Section 4.9 has been expanded in response to public comments concerning socioeconomic impact in areas overflowed by aircraft under the proposed action. Environmental Justice is addressed in Sections 3.9 and 4.9.
- W-496 Safety issues are addressed in Sections 3.13 and 4.13. Sleep interference issues are examined in Appendix D. Property damage and associated economic losses can only be determined by review of the circumstances of the individual case.
- W-497 The proposed action would be in compliance with all applicable laws and regulations, including FAA regulations concerning low-level flying.
- W-498 In response to public comment, Sections 4.3 and 4.9 have been expanded to provide additional information on potential impacts to land use and regional socioeconomics.
- W-499 The procedure used to calculate the noise levels and their impacts are based on established scientific methods and analysis. The use of these procedures was reaffirmed as recently as 1992 by the Federal Interagency Committee on Noise (FICON, 1992), which included representatives of the Department of Defense, the Environmental Protection Agency, the Department of Transportation, the Department of Housing and Urban Development, and the Department of Veteran Affairs. Section 4.2 of the EIS details the noise modeling approach, the reliability of the noise predictions, and the accuracy of the noise predictions.
- W-500 The emission calculations are based on the best available compilations of emission factors and calculation methods. The emission factors for determining criteria pollutant emissions are provided by the most recent EPA and Air Force compilations for military aircraft.

- W-501 Comment noted. The analysis addresses the impacts of the proposed action, but also takes into account cumulative effects of aircraft operations in the affected airspace.
- W-502 During the public scoping process, impact to rural socioeconomic conditions was not identified as an issue of concern. In response to comments received during the public comment period, additional information has been included in Section 4.9 dealing with the potential impact of the proposed action on rural socioeconomic conditions.
- W-503 Potential mitigation of impacts due to overflight of the Mexican Wolf Management Site is being considered in formal consultation between the Air Force and the FWS. The Air Force began consultations November 24, 1997. Once consultations are complete, appropriate mitigations will be implemented.
- W-504 Comment noted. Information on noise levels in affected areas is provided in Section 4.2. The analysis of land use (Section 4.3) indicates no appreciable change in noise in the area under the MTRs of interest. Therefore, no change in route boundaries would be needed due to the proposed action. It should be noted that Talon Low MOA would not abut Carlsbad Caverns National Park.
- W-505 Additional discussion of this subject has been provided in Sections 3.5 and 4.5.
- W-506 The variety of Air Force activities in the region are not a part of a single program or policy initiative regarding training and airspace use. Separate analyses of these various activities will adequately assess their combined cumulative impacts. Consequently, a programmatic EIS is not needed. Nonetheless, this EIS does, in fact, analyze the cumulative impacts of this action with all past, present, and reasonably foreseeable future actions. The referenced MTR change is reflected in the *Final Environmental Assessment of Airspace Modifications to Support Units at Holloman AFB, New Mexico* (U.S. Air Force, 1997a).
- W-507 The proposed action does not involve overflight of designated Wilderness Areas within Guadalupe Mountains National Park.
- W-508 The low-level IR-102/141 corridor is over 3,000 feet from the western boundary of Guadalupe Mountains National Park (including the acquisition area). While overflights should not occur, incidents where aircraft overfly the park can be reported to the Public Affairs Office at Holloman AFB (505-475-5406).

- W-509 The Air Force has a vested interest in avoiding flight in specific areas during times when high concentrations of birds, and especially raptor species, are present. As a result, the Air Force has invested considerable resources to identify those periods and locations where flight would present a hazard to aircrews and avifauna. Aircrews are advised on a daily basis during preflight briefings of the presence or potential for such biohazards.
- W-510 Section 4.5 and Appendix J have been expanded to further address this issue. In addition, consultations with the USFWS are ongoing.
- W-511 Section 3.3 has been expanded to address this issue.

SECTION 3.0

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